

---

**REPORT ON  
DATA PROTECTION OFFICER CONFERENCE 2011  
8 MARCH 2011, TUESDAY, MANCHESTER CENTRAL CONVENTION COMPLEX<sup>1</sup>**

---

***By Noriswadi Ismail  
Academic Visitor (14 February 2011 – 4 April 2011)  
University of Oxford Centre for Socio-Legal Studies***

---

<sup>1</sup> This report is painstakingly written based on the author's attendance in the plenary sessions of the conference. In the interest of research and dissemination, the author has appended the relevant appendixes at page 10 of this report. Most importantly, the contents of this report do not represent the analysis, views or observations of University of Oxford Centre for Socio-Legal Studies. All contents are of the author's responsibility.

## **Background: conference organisation**

---

This is the fourth annual Data Protection Officer conference. It attracted almost 500 registered delegates of various industry sectors. The conference was chaired by Jonathan Bamford, Head of Strategic Liaison, Information Commissioner's Office (ICO). It was divided into two sessions (plenary and workshops).

In the plenary session, delegates were enlightened by the keynote address delivered by The Right Honourable Lord McNally, Minister of State, Ministry of Justice; David Smith, Deputy Commissioner and Director of Data Protection, ICO (on Data protection law – where are we now? And where are we going?); Jose Manuel de Frutos Gomez, European Commission (on Replacing the EU Data Protection Directive – what can we expect?); Graham Smith, Deputy Commissioner and Director of Freedom of Information, ICO (on Freedom of Information – where are we now? And where are we going?); and Katie Davis, Executive Director, Operational Excellence, Efficiency and Reform Group, The Cabinet Office.

In the workshops' session, delegates were directed to nine different workshops based on their 2 registered preferences prior to the conference. The author joined the workshops on new ePrivacy regulations and the Data Sharing code of practice. The first workshop was led by David J. Evans, Group Manager – Business and Industry, Strategic Liaison, ICO and Anne Russell, Policy Officer – Business and Industry, Strategic Liaison, ICO. The second workshop was led by Iain Bourne, Group Manager – Data Protection, Policy Delivery, ICO and Lyn Wibberley, Senior Policy Officer – Data Protection, Policy Delivery, ICO.

### **Keynote address:**

#### **The Right Honourable Lord McNally, Minister of State, Ministry of Justice**

---

##### *Civil monetary and enforcement*

Lord McNally acknowledged that the conference was very timely in light of the present data protection landscape. The most topical concern, at hand, is on civil monetary and enforcement. On this, the present coalition government is looking into the possibility to consider prison sentencing that is resulted from illegal data selling. The proposed monetary penalty to be introduced under sections 55A and 55B of the Data Protection Act 1998, is also being considered. Under these sections, the ICO may, in certain circumstances, serve a monetary policy notice on a data controller. The notice requires a data controller to pay a monetary penalty of an amount determined and specified by the ICO, not exceeding £500,000.<sup>2</sup> On a similar vein, the proposal to issue unlimited fines imposed by the crown courts is also being reviewed. The report on 'What Price Privacy' was also cited.<sup>3</sup> In short, Lord McNally reaffirmed the ongoing commitment to combat illegal data trade, being a serious criminal act. Such offences to that effect should be recordable and the power to introduce prison sentences would be remained relevant.

---

<sup>2</sup> See Data Protection 1998 Information Commissioner's guidance about the issue of monetary penalties prepared and issued under section 55C (1) of the Data Protection Act 1998 <[http://www.ico.gov.uk/upload/documents/library/data\\_protection/detailed\\_specialist\\_guides/ico\\_guidance\\_monetary\\_penalties.pdf](http://www.ico.gov.uk/upload/documents/library/data_protection/detailed_specialist_guides/ico_guidance_monetary_penalties.pdf)> accessed 9 March 2011.

<sup>3</sup> See What Price Privacy? The unlawful trade in confidential personal information <[http://www.ico.gov.uk/upload/documents/library/corporate/research\\_and\\_reports/what\\_price\\_privacy.pdf](http://www.ico.gov.uk/upload/documents/library/corporate/research_and_reports/what_price_privacy.pdf)> accessed 9 March 2011.

### *Freedom of Information (FOI)*

The underpinning nature of FOI is that it aims to ensure that all public bodies are acting based on the public interest. On 7 January 2011, the Ministry of Justice has introduced plans to extend the scope of FOI to open up government and other public bodies to public scrutiny.<sup>4</sup> This extension, directly, enhances the independence of ICO. As a result of extension, amongst others, the Financial Ombudsman Services would be required to comply.<sup>5</sup> Ongoing effort is also being done in relation to reducing the 30 year rule to 20 year rule, which governs the point of which records of lasting historical value are normally transferred to The National Archives.<sup>6</sup>

Lord McNally reiterated that these efforts (civil monetary and enforcement and FOI) are an expensive exercise. The stakeholders would be able to witness its outcome tentatively by January 2013. Most importantly, a post legislative scrutiny of FOI Act is pertinent as it aims to review and ensure effective mechanism is visible so that the public is well informed. On the wider cabinet office transparency agenda, the present coalition government leadership has, thus far, exercised greater scrutiny. For instance, all awarded IT contracts exceeding £10,000 are disclosed to the public on specified government's website. This is meant to increase the level of transparency in dealing with public affairs.

### *Initiatives at the European level*

Two progressive developments have taken place; the review of the Data Protection Directive (DPD) 95/46/EC and the Council of Europe – ETS no. 108 Convention for the Protection of Individuals with regards to Automatic Processing of Personal Data. Based on these, Lord McNally emphasised that effective enforcement between and amongst the EU Member States are particularly critical. He duly recognised that these two instruments need to be abreast with the speed and reach of sophisticated technology. The historic drafting milestones of these instruments were not meant to accommodate present's technological outreach. This is due to the globalisation in digital age and exponential growth of e-commerce.

In brief, Lord McNally applauded the very high responses (almost 160 responses) from the recent proposed review of DPD. It should be noted that the review of responses would take a long process of research, analysis and discussions with and amongst the EU Member States. In taking such responses into consideration, broader thematic questions to review such instruments are also put into test; such as whether the principle based approach, deemed to be sensible or whether such flexibility approach deemed to be the preferred way. The result of these responses would be seen by summer of 2011. Similarly, the ePrivacy Directive<sup>7</sup> which would come into force on 25 May 2011 is another testimony, which evidences the

---

<sup>4</sup> See Ministry of Justice, Opening up public bodies to public scrutiny < <http://www.justice.gov.uk/news/newsrelease070111a.htm>> accessed 10 March 2011.

<sup>5</sup> See Freedom of Information and Data Protection < <http://www.financial-ombudsman.org.uk/about/foi.htm>> accessed 10 March 2011.

<sup>6</sup> See Ministry of Justice, Government Response to the 30-Year Rule Review < <http://www.justice.gov.uk/about/docs/government-response-30-year-rule-review.pdf>> accessed 10 March 2011. See also BBC, The coming 20-year rule < [http://www.bbc.co.uk/blogs/opensecrets/2010/02/the\\_coming\\_20\\_year\\_rule.html](http://www.bbc.co.uk/blogs/opensecrets/2010/02/the_coming_20_year_rule.html)> accessed 10 March 2011.

<sup>7</sup> See ICO News Release of 8 March 2011 on UK businesses must 'wake up' to new EU Law on cookies, Information Commissioner warns <[http://www.ico.gov.uk/~media/documents/pressreleases/2011/data\\_protection\\_officer\\_conference\\_news\\_release\\_08032011.ashx](http://www.ico.gov.uk/~media/documents/pressreleases/2011/data_protection_officer_conference_news_release_08032011.ashx)> accessed 11 March 2011.

seriousness to combat behavioral advertising. Governments across the EU Member States are working very hard to commit with the deadline of 25 May 2011.<sup>8</sup>

### *Call for upholding informational rights*

On this note, Lord McNally expressed that data protection provides the freedom of choice and safety net to all citizens and states. Critically, the coalition government and the EU Member States strive to clarify such engaging data protection issues as to ensuring that the legislation is up to date. Further, he pointed out the importance and enduring challenge to define basic concepts of 'consent' and distinguish the dotted line between 'personal', 'sensitive personal data', 'personal financial data' and 'children's data'. Challenging questions also emerged not only by legislation alone, but also in accommodating with such sophisticated technology (Biometric technology was cited as example).

The need to self-regulate is also relevant, especially within the context of knowledge economy. From the business viewpoint, Lord McNally generally touched on 'subject access request' and data sharing code of practice. In business, the interest of consumers must be taken care of, as it would enhance the trust, loyalty and consumers' confidence.<sup>9</sup> In his final remarks, he encouraged stakeholders to stimulate healthy debate in data protection and FOI so that such contrasting voices are heard and addressed. So much so, in this digital information age, it's rightfully for everyone to uphold informational rights for the purpose of increasing transparency and accountability. And, he further uttered that it's possible to achieve and ended his keynote address with: 'Change is our Constant Companion'.

### **David Smith**

#### **Deputy Commissioner and Director of Data Protection, ICO**

#### **Data protection law – where are we now? And where are we going?**

---

### *ICO updates*

David Smith updated the progressive status of ICO caseload; phone enquiries (212,000), data protection cases (33,000), new notifications (42,000) and information requests to ICO (1,000). The numbers revealed that ICO would work vigorously to ensure penalties are imposed to data controllers who lack the appropriate systems and risk assessment. As far as the enforcement notices are concerned, ICO has issued numbers of notices that are retrievable via its website.<sup>10</sup> The chief executives of companies and head of departments or respective organisations sign the compliance undertakings of these notices. What this means is that ICO is taking enforcement notice seriously.

---

<sup>8</sup> See BBC News Technology – Governments 'not ready' for new European Privacy Law <<http://www.bbc.co.uk/news/technology-12677534>> accessed 11 March 2011. See also CBR Systems & Networks Security – Cookies only if explicitly consented: EU's e-Privacy Directive: <<http://security.cbronline.com/news/cookies-only-if-explicitly-consented-eus-e-privacy-directive-090311>> accessed 11 March 2011. See also the mixed up reviews on The Wall Street Journal Digital Network TechEurope – EU Privacy Directive Angers Start-Ups <<http://blogs.wsj.com/tech-europe/2011/03/09/e-u-privacy-directive-angers-start-ups/>> accessed 11 March 2011.

<sup>9</sup> See specifically The Privacy Dividend – The business case for investing in proactive privacy protection <[http://www.ico.gov.uk/upload/documents/library/data\\_protection/detailed\\_specialist\\_guides/privacy\\_dividend.pdf](http://www.ico.gov.uk/upload/documents/library/data_protection/detailed_specialist_guides/privacy_dividend.pdf)> accessed 11 March 2011.

<sup>10</sup> See ICO Taking Action <[http://www.ico.gov.uk/what\\_we\\_cover/promoting\\_data\\_privacy/taking\\_action.aspx](http://www.ico.gov.uk/what_we_cover/promoting_data_privacy/taking_action.aspx)> accessed 11 March 2011.

In addition, he shared two related issues; firstly, actions by journalists using private investigators to retrieve related personal information from the royal families<sup>11</sup> and public figures. Secondly, the action by ICO against T-Mobile employees (on illegal data selling of their customers' data).<sup>12</sup> On the latter, the ICO viewed that it's best to take back the profits from the illegal data selling. This is currently being considered to deter data theft. Apart from that, the ICO has also conducted independent audit to governmental departments. The ultimate aim is to ensure that such systems of data protection and FOI are in place. Some other developments that the ICO have done thus far, include it's reorganisation, appointment of technology advisor, publication of the personal information online code, issuance of draft statutory code on data sharing,<sup>13</sup> surveillance society update<sup>14</sup> and supporting the coalition government's transparency agenda.<sup>15</sup>

### *ICO present headways*

The ICO has been very supportive with the proposed Protection of Freedoms (POF) Bill.<sup>16</sup> Broadly, the areas of law that are set to change in the POF, amongst others are; the DNA database, detention without charge, vetting and barring scheme, CCTV and the council powers.<sup>17</sup> In view of this, the ICO would work very closely with the proposed CCTV Surveillance Commissioner in relation to issues that might arise. Detailed developments and progress on the proposed POF would be notified when the time comes.

Other priorities that ICO have had undertaken includes the guidance review on privacy by design,<sup>18</sup> renewal of ICO's website and supporting data protection officers on any issues related to information rights strategy. In a related development, the ICO also continuously supports the economic sense to build such privacy system (for example, the deployment of Privacy Enhancing Technologies).<sup>19</sup> Further, David Smith pointed out that the ICO is working closely with its EU Member States' counterparts on issues pertaining to privacy and electronic regulations and the much-awaited ePrivacy Directive implementation and enforcement.

---

<sup>11</sup> See The Telegraph, Hacking: private detective ordered to reveal celebrities on target list <<http://www.telegraph.co.uk/news/uknews/crime/8347879/Phone-hacking-private-detective-ordered-to-reveal-celebrities-on-target-list.html>> accessed 11 March 2011. See also

<sup>12</sup> See ICO Press Release dated 17 November 2009 on Mobile phone customers' records are sold illegally <[http://www.ico.gov.uk/~media/documents/pressreleases/2009/MOBILE\\_PHONE\\_RECORDS\\_S55\\_171109.ashx](http://www.ico.gov.uk/~media/documents/pressreleases/2009/MOBILE_PHONE_RECORDS_S55_171109.ashx)> accessed 11 March 2011.

<sup>13</sup> See ICO Our Current Consultations <[http://www.ico.gov.uk/about\\_us/consultations/our\\_consultations.aspx](http://www.ico.gov.uk/about_us/consultations/our_consultations.aspx)> accessed 11 March 2011.

<sup>14</sup> See Information Commissioner's report to Parliament on the state of surveillance <[http://www.ico.gov.uk/~media/documents/library/Corporate/Research\\_and\\_reports/surveillance\\_report\\_for\\_home\\_select\\_committee.ashx](http://www.ico.gov.uk/~media/documents/library/Corporate/Research_and_reports/surveillance_report_for_home_select_committee.ashx)> accessed 11 March 2011.

<sup>15</sup> See generally an observation by one conference attendee on this <<http://foiman.com/archives/219>> accessed 11 March 2011.

<sup>16</sup> See generally the ICO's evidence to the Public Bill Committee On the Protection of Freedoms Bill <[http://www.ico.gov.uk/news/~media/documents/library/Corporate/Detailed\\_specialist\\_guides/protection\\_of\\_freedoms\\_bill\\_ic\\_evidence.ashx](http://www.ico.gov.uk/news/~media/documents/library/Corporate/Detailed_specialist_guides/protection_of_freedoms_bill_ic_evidence.ashx)> accessed 14 March 2011.

<sup>17</sup> See BBC News Politics – How Protection of Freedoms Bill will work <<http://www.bbc.co.uk/news/uk-politics-12536138>> accessed 14 March 2011.

<sup>18</sup> See ICO Privacy by design <[http://www.ico.gov.uk/upload/documents/pdb\\_report\\_html/privacy\\_by\\_design\\_report\\_v2.pdf](http://www.ico.gov.uk/upload/documents/pdb_report_html/privacy_by_design_report_v2.pdf)> accessed 14 March 2011.

<sup>19</sup> See ICO Data Protection Guidance Notice: privacy enhancing technologies (PETs) <[http://www.ico.gov.uk/upload/documents/library/data\\_protection/detailed\\_specialist\\_guides/privacy\\_enhancing\\_technologies\\_v2.pdf](http://www.ico.gov.uk/upload/documents/library/data_protection/detailed_specialist_guides/privacy_enhancing_technologies_v2.pdf)> accessed 14 March 2011.

### *ICO future headways*

Accountability and communications would be the key areas that the ICO emphasises. This is reflected through its commitment to further refine the limitations in defining the difference between anonymous and non-anonymous information. The ICO has been working closely with the Article 29 Working Party to ensure the commitment of future effective legal framework is addressed. In sum, David Smith concluded by mentioning that ICO should be regarded as an 'enabler' to the stakeholders, but not a 'blocker'. Its presence also demands high level of protection, clear responsibility and accountability of informational rights from the stakeholders and organizations, nationally and internationally.

There were two questions posed to David Smith. Firstly, a delegate asked about the potential duplication roles that the proposed CCTV Surveillance Commissioner<sup>20</sup> would have vis-à-vis the ICO. In responding to this, the ICO was of the view that there might be some overlapping concerns, nonetheless, it's still premature to decide at this point of time and ICO would see how it could work together with the CCTV Surveillance Commissioner. Secondly, a delegate posed the issue on accountability between the private sector and public service delivery. The general response to this is that ongoing debate on accountability between private sector and public service is very challenging and complex. Various cycles of debates have addressed this. Nonetheless, the ICO was of the view that private sectors would bring greater efficiency and more effective service to increase the value of accountability.

### **Jose Manuel de Frutos Gomez European Commission**

---

Jose Manuel represented the European Commission (EC) in place of Laura Corrado.

In his updates, Jose Manuel opened his remarks by sharing that sophisticated technologies<sup>21</sup> have challenged the existing data protection legislation. This is resulted from globalisation in the information age. At the EC level, various public consultations were made with the Member States and participating stakeholders. The latest consultation on the proposed review of the DPD 95/46/EC has evidenced the stakeholders' seriousness to reform. The elements of reform that are deemed significant throughout the EU are strengthening the individuals' rights, enhancing the internal market dimension, revising the rules of police and judicial cooperation in criminal matters and the global dimension of data protection for effective enforcement, remedies and sanctions.

### *Thoughts by the EC*

There are three significant thoughts disseminated by Jose Manuel. Firstly, the issue of consent must be clearly clarified in terms of its scope, meaning and application. On this, the EC is reviewing all submitted responses as well as looking the right balance to achieve such possible answer. Secondly, it is paramount to reduce administrative burdens by enhancing the roles of data controllers more responsibly. This, in a way, would encourage self-regulatory initiative across the EU. In his passing remark, Jose Manuel also mentioned about the possibility to establish the

---

<sup>20</sup> See Guardian government computing – CCTV and ANPR to get commissioner and code <<http://www.guardian.co.uk/government-computing-network/2011/feb/11/cctv-commissioner-code-anpr-freedoms-bill>> accessed 14 March 2011.

<sup>21</sup> For example, nanotechnology, ubiquitous computing, geo-location, video surveillance, profiling and scoring systems, behavioral advertising, biometrics data and DNA access.

EU certification schemes on data protection. Nonetheless, the details of this were not elaborated. Thirdly, it is highly and timely for the EU Member States to revise the data protection rules in the area of police and judicial cooperation in criminal matters, which also includes the processing at domestic level.

#### *EC on international data transfers*

EC was of the view that it is timely to clarify and simplify the rules for international data transfers, which also include the adequacy level and procedures. Of relevance, the Binding Corporate Rules (BCR) would also be streamlined as to ensure it's effectively applied, instead of, being regarded as a bureaucratic impediment in global transborder data flow. These issues would be on EC priority list.

#### *EC on its way forward*

Jose Manuel emphasised the importance of integrated enforcement of data protection rules. This also ranges from the coordination and cooperation, between and amongst, the Data Protection Authorities, Data Protection Supervisors and to the Article 29 Working Party. This is indispensable so that there would be a consistent common voice, stance and philosophies that transpired from such integrated enforcement. Whilst awaiting the outcome of the consultation, the EC also viewed that such adaptation of other legal instruments to the new general data protection framework should also be considered. In short, Jose Manuel endeavoured that the new framework would be unleashed during summer of 2011 in 23 languages – the details, of which, would be announced vide the EC website.

There were two questions addressed. Firstly, a delegate asked about the sophisticated administrative requirements on notification procedures where one has to deal with 27 different requirements, which is regarded as administrative burden. In responding to the delegate question, Jose Manuel was of the view that the EC is looking into the option to simplify the requirements and putting a higher level of responsibility to the data controllers. It is to note that to simplify such requirements is a herculean task as it involves 27 different domestic requirements of the 27 Member States. Nonetheless, such complexities must be addressed in a way that it should be able to encourage transparency and accountability. Secondly, a delegate posed a question about the level of UK compliance in relation to the DPD as it was learnt that UK is quite laggard. In clarifying the concern, Jose Manuel responded that the UK has been doing quite well in terms of complying with the DPD commitments. He further stated that one has to look compliance matters broadly, instead of being too restrictive. In other words, other Member States also have their own domestic and respective challenges to comply. So much so, such compliance matters and issues would not be taken by isolation by the EC.

**Graham Smith**  
**Deputy Commissioner and Director of FOI**

---

*Where is FOI now?*

Graham Smith addressed that the FOIA is now 10 years old as it took quite an overtime to reach the ground. The key factor was contributed by the lack of political direction, leadership and transparency. Historically, FOIA was enacted based on paper records' storage that was meant for disclosure. The same was based on the United States of America, Canada and Australia's approaches. Further, the present coalition government, it's transparency agenda, is very adamant to extend the FOIA enforcement to potential public service departments.

In terms of the process<sup>22</sup>, Graham Smith affirmed that the role of Information Commissioner is very much independent. Such order for disclosure by the Information Commissioner, when required, and if failed to do so, leads to contempt of court. Such FOI cases might have data protection elements and in such contexts, the tribunal would undertake to define such data protection elements and issues within the context of FOI. The practicable and integrated approach would also mean that by combining data protection and FOI, the tribunal would address such issues carefully. The ICO performance on FOI was also shared, throughout 2009/2010 the FOI received 3700 complaints, and 4100 complaints were closed, and there were 628 decision notices served and 161 appeals filed.

*Looking ahead*

The ICO would continuously undertake its enforcement activities, streamlining such investigative processes, providing tougher stance on timeliness and expecting full and prompt replies from the relevant stakeholders. From the wider picture, Graham Smith was of the view that the tension between transparency and openness would be there. It would be the responsibility of the stakeholders to comply and uphold.

**Katie Davies**  
**Executive Director, Operational Excellence and Reform Group**  
**The Cabinet Office**

---

Katie Davies impressed the delegates with the coalition government's agenda to be the most transparent government in the world.<sup>23</sup> Amongst the initiatives that have been taken by the government include; the creation of contract finders (detailing all awarded contractors), the establishment of Transparency Board and public data principles.<sup>24</sup> She elucidated that transparency does not conflict with privacy, as it would further add the value to privacy, although it might not be the one size fits all situation. In her presentation, she updated the ongoing efforts such as; Schoolslope (which assist parents to make decision in selecting schools for their children)<sup>25</sup> and the joint collaborative effort with the Open Knowledge Foundation to show the public how their tax monies are spent.<sup>26</sup> The next steps for the government would be to

---

<sup>22</sup> See ICO FOIA <[http://www.ico.gov.uk/for\\_organisations/freedom\\_of\\_information.aspx](http://www.ico.gov.uk/for_organisations/freedom_of_information.aspx)> accessed 14 March 2011.

<sup>23</sup> See Transparency, Number 10.gov.uk <<http://transparency.number10.gov.uk/>> accessed 14 March 2011.

<sup>24</sup> See Opening up government <<http://data.gov.uk/blogs/leadership>> accessed 14 March 2011.

<sup>25</sup> See Schoolslope <<http://www.schoolscope.com/>> accessed 14 March 2011. See also Guardian , Schoolslope: the 4ip funded project to make Ofsted tables accessible <<http://www.guardian.co.uk/media/pda/2010/may/13/schools-data-schoolscope-design>> accessed 14 March 2011.

<sup>26</sup> See generally Local Spending Data Guidance <<http://data.gov.uk/blog/local-spending-data-guidance>> accessed 14 March 2011.

improve the quality and usability of these initiatives so that the message would reach the public in clarity. Transparency, according to Katie Davies, is not meant for the government only. She encouraged and called for a culture change to all stakeholders so that the ownership of this agenda would be yielded and proactively upheld.

Two questions were posed to Katie Davies. Firstly, a delegate queried whether the transparency agenda is extendable to the local governments, and if there were, what would be timescale. In responding to this, Katie Davies shared that it is a challenge to extend the same to the local governments, nonetheless, there is a sign of moving forward enthusiasm and to a certain extent, local government might move faster than the central government due to the economic and business demands by the private sector and stakeholders. Secondly, a delegate sought Katie Davies' view with regards to the distribution of the 2011 Census Form.<sup>27</sup> She responded that she would look into that matter as to the nature of information that would be handled.

*-The rest of this page is intentionally left blank-  
-End of report-*

---

<sup>27</sup> See BBC Census 2011: Forms on their way to millions of homes <<http://www.bbc.co.uk/news/uk-12661100>> accessed 14 March 2011.

## **APPENDIXES**

- 1) Data Protection Act 1998 – Information Commissioner’s guidance about the issue of monetary penalties prepared and issued under section 55C (1) of the Data Protection Act 1998.
- 2) The Information Commissioner’s evidence to The Public Bill Committee On the Protection of Freedom Bills (in Pdf).
- 3) The Information Commissioner’s report to Parliament on the state of surveillance (in Pdf).
- 4) What price privacy? The unlawful trade in confidential personal information (in Pdf).