

Note on this presentation

March 2025

- These slides were presented after the Privacy Research Day 2024
- The presentation is organized in three parts:
 - Quickly present the CNIL, its organization and missions
 - Explain CNIL actions and competences (with a focus on enforcement)
 - Present the LINC and our research project
- Some of these slides have not been updated in 2025 yet and may be outdated (following CNIL new organization)



A quick presentation of CNIL and LINC

05 June 2024

CNIL organisation

- Administratively Independent Administration (board of 18 members)
 - 4 parliamentarians
 - 2 members of the Environmental and Social Council
 - 6 representatives of the highest courts
 - 5 « qualified personalities »
 - The Chairman of the Office of Information Policy (FOIA)
- Chairwoman nominated by the President (re appointed in 2024)
- Members of the CNIL do not receive orders from the government
- Budget voted by the congress
- Enforce the GDPR, ePrivacy (Cookies) and French Data Protection Act
- Staff 280 people
 - 48% legal experts, 19% computer scientists

INFORM, PROTECT RIGHTS

The CNIL responds to requests from individuals and professionals. It carries out communication actions with the general public and professionals, whether through its networks, the press, its website, its presence on social networks or by providing educational tools.

Any person may contact the CNIL in case of difficulty in exercising their rights

SUPPORT COMPLIANCE AND ADVISE

In order to help private and public organizations to comply with the RGPD, the CNIL offers a complete toolbox adapted to their size and needs.

The CNIL ensures that solutions are found to enable them to pursue their legitimate objectives in strict compliance with citizens' rights and freedoms.

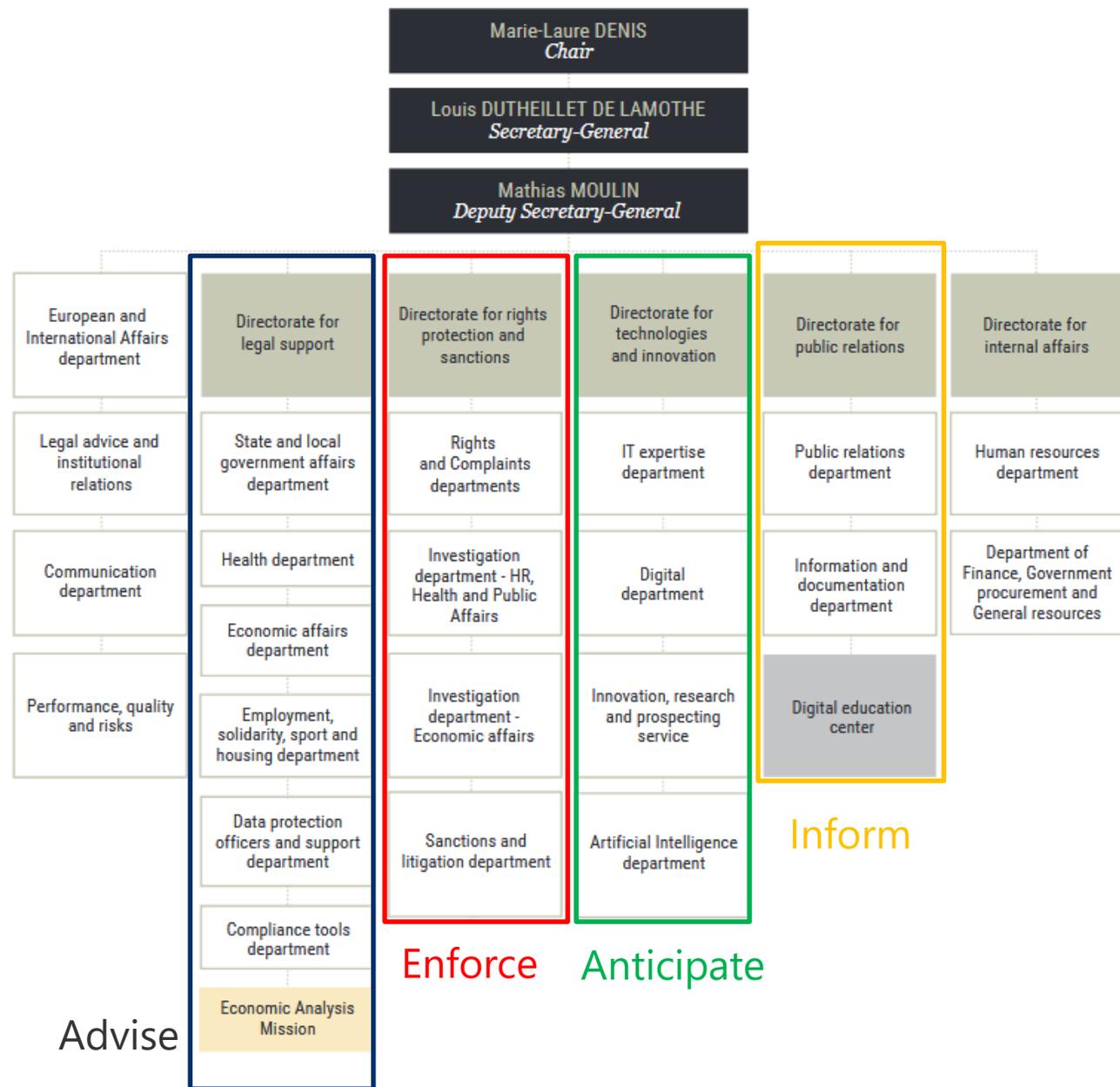
ANTICIPATE AND INNOVATE

In order to detect and analyse technologies or new uses that could have a significant impact on privacy, the CNIL carries out a dedicated watch.

It contributes to the development of privacy-protective technological solutions by advising companies as early as possible, in a "privacy by design" approach.

CONTROL AND SANCTION

The control allows the CNIL to verify the concrete implementation of the law. It can require an organization to regularize its processing (order to comply) or impose sanctions (fine, etc).



INFORM, PROTECT RIGHTS

The CNIL responds to requests from individuals and professionals. It carries out communication actions with the general public and professionals, whether through its networks, the press, its website, its presence on social networks or by providing educational tools.

Any person may contact the CNIL in case of difficulty in exercising their rights

SUPPORT COMPLIANCE AND ADVISE

In order to help private and public organizations to comply with the RGPD, the CNIL offers a complete toolbox adapted to their size and needs.

The CNIL ensures that solutions are found to enable them to pursue their legitimate objectives in strict compliance with citizens' rights and freedoms.

ANTICIPATE AND INNOVATE

In order to detect and analyse technologies or new uses that could have a significant impact on privacy, the CNIL carries out a dedicated watch.

It contributes to the development of privacy-protective technological solutions by advising companies as early as possible, in a "privacy by design" approach.

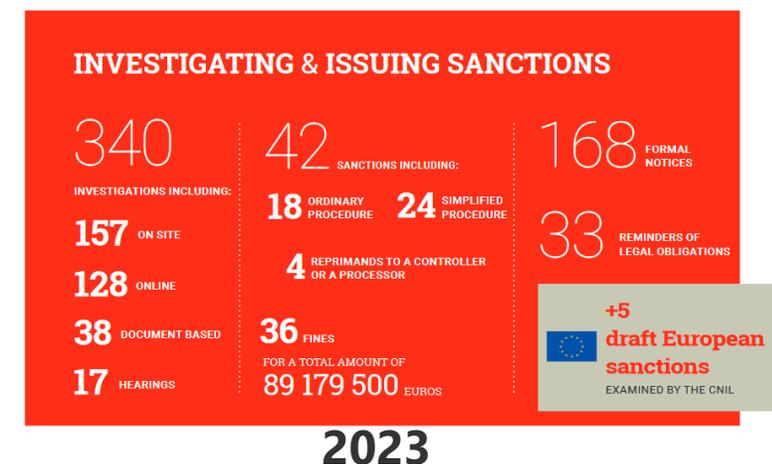
CONTROL AND SANCTION

The control allows the CNIL to verify the concrete implementation of the law. It can require an organization to regularize its processing (order to comply) or impose sanctions (fine, etc).

2022: 21 sanctions, total of 101,277,900 euros

2023: 42 sanctions, total of 89,000,000 euros

- In most cases, CNIL can only investigate (and if necessary sanction) companies :
 - Whose main establishment is in France or
 - With no establishment in Europe (with a loophole)
- Complaints concerning entities whose main established is in another countries are transferred to the lead authority (several significant tech companies are in Ireland and Luxembourg)
- Most frequent grounds:
 - Failure to inform individuals;
 - Failure to respect individuals' rights;
 - Failure to cooperate with the CNIL.
- Every year, one third concern the **security of personal data**:
 - the security measures taken by the organizations are often insufficient;
 - the CNIL systematically checks the security of information systems when it carries out an inspection.



1

INFRINGEMENT REPORTS



COMPLAINTS*

user reports
on cnil.fr



SELF-REFERRAL

topics identified
as a priority



PRESS

allegations made
in the press
or online



COOPERATION

reports by
other EU data
protection authority

2

INVESTIGATIONS



ON SITE

access to
processing of
personal data



ONLINE

if the infringement
can be established
remotely



HEARINGS

of the concerned
persons



DOCUMENT-BASED

written questions
and requests
for documents

3 OUTCOME OF INVESTIGATIONS

NONE OR MINOR INFRINGEMENTS

SERIOUS INFRINGEMENTS



CLOSURE
of the procedure and sending of a letter to the investigated organization



THE CHAIR
of the CNIL can render an order to comply



RESTRICTED COMMITTEE
can decide to issue a sanction to a data controller



THE CHAIR
RESTRICTED COMMITTEE

A COMPLAINT*
can give rise to an order to comply or a sanction without a prior investigation



COMPLIANT WITHIN THE DELAY?



CLOSURE
Further investigation if necessary

STILL NOT COMPLIANT AFTER THE DELAY?



ORDER TO COMPLY
The organization must comply within a period of 8 months or 1 year maximum

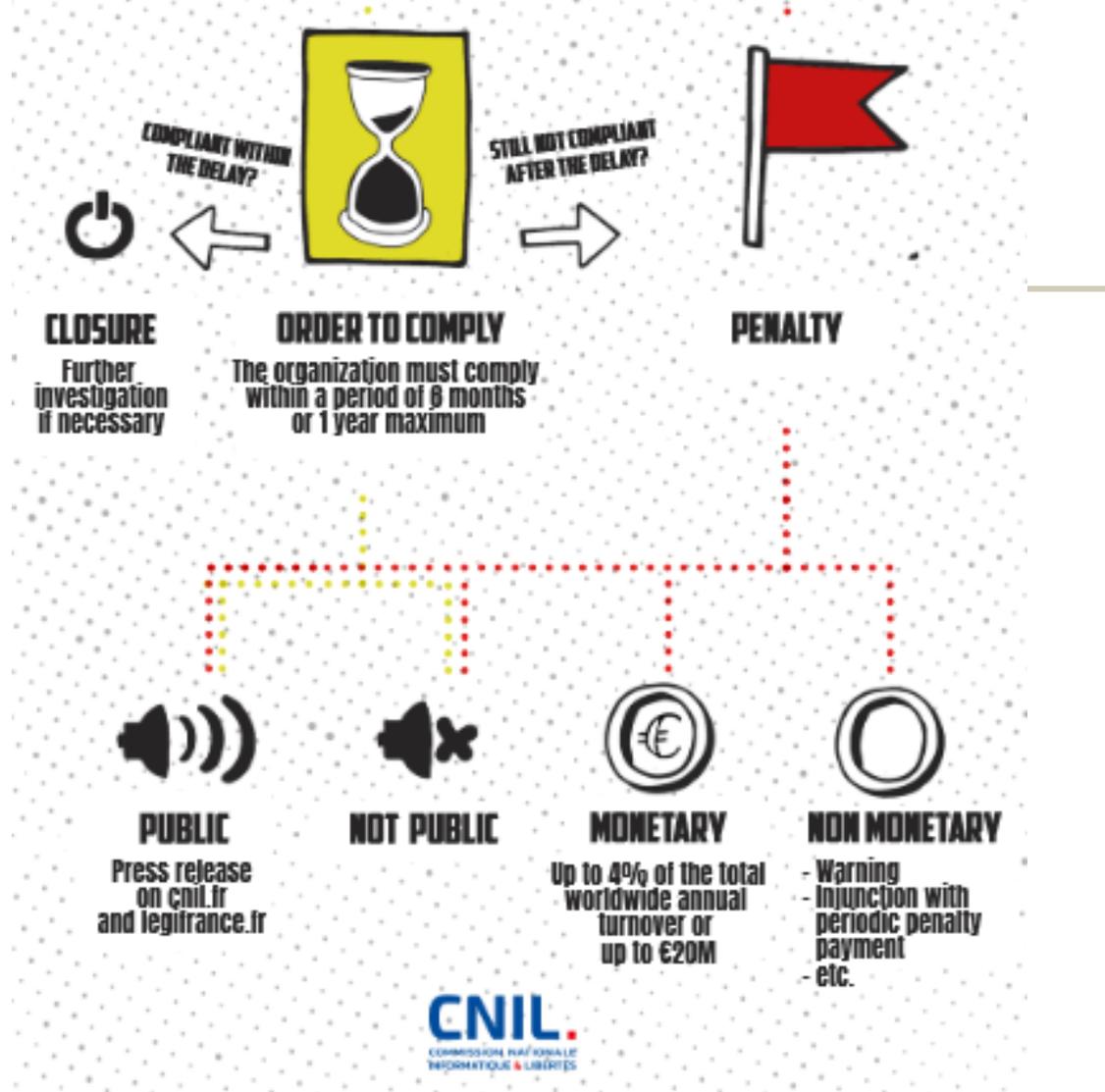


PENALTY

Since 2022
"Simplified sanctions"

- Similar to previous decision
- Simple question

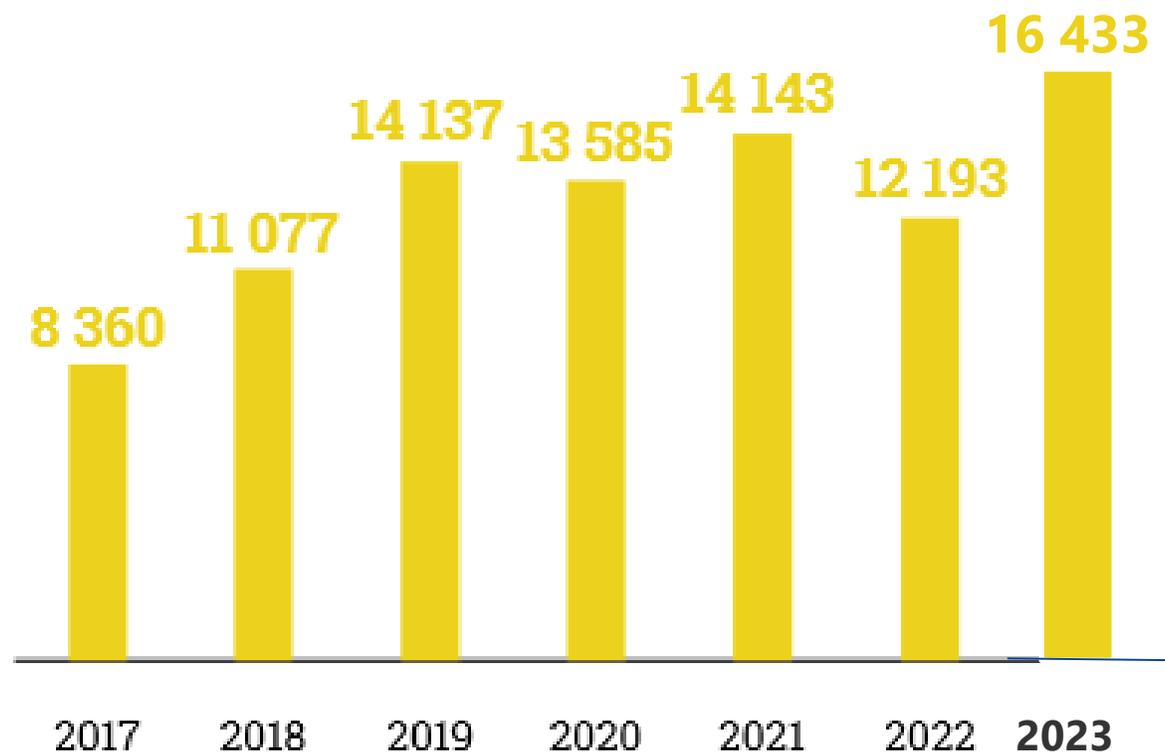
Sanction up to 20K but not public



After two years :

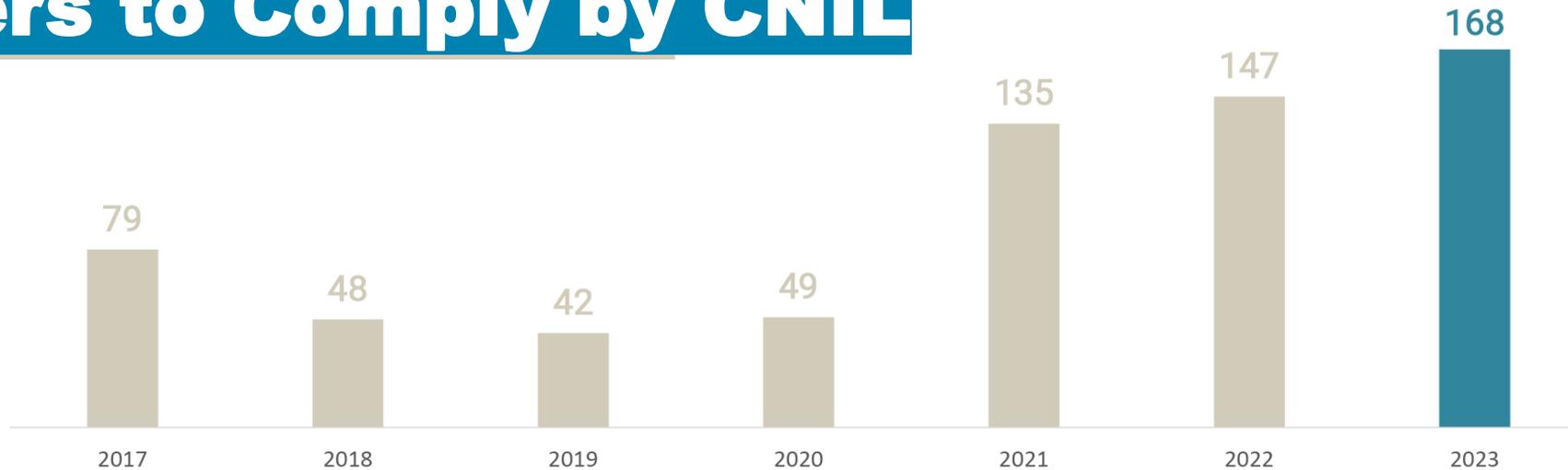
- Sanctions are pseudonymized on Legifrance (the French laws and decisions directory)
- They are deleted from CNIL's website

CNIL receives a lot of complaints, but a bit less this year



CNIL not only sanctions but also gives orders to comply

Orders to Comply by CNIL



39 for HTTPS issues on public websites

39 on vehicle registration ID readers

2022: 21 sanctions, total of 101,277,900 euros



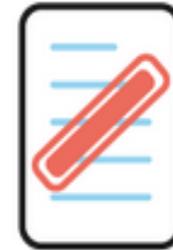
21

sanctions



EUR 101 millions

fines



147

notices of formal notice

2023: 42 sanctions, total of 89 179 500 euros

Les sanctions de la CNIL en 2023

42 sanctions

pour un montant de

89 179 500 €

1 sanction sur 3

comporte un
manquement à la

sécurité
des données

5 décisions européennes

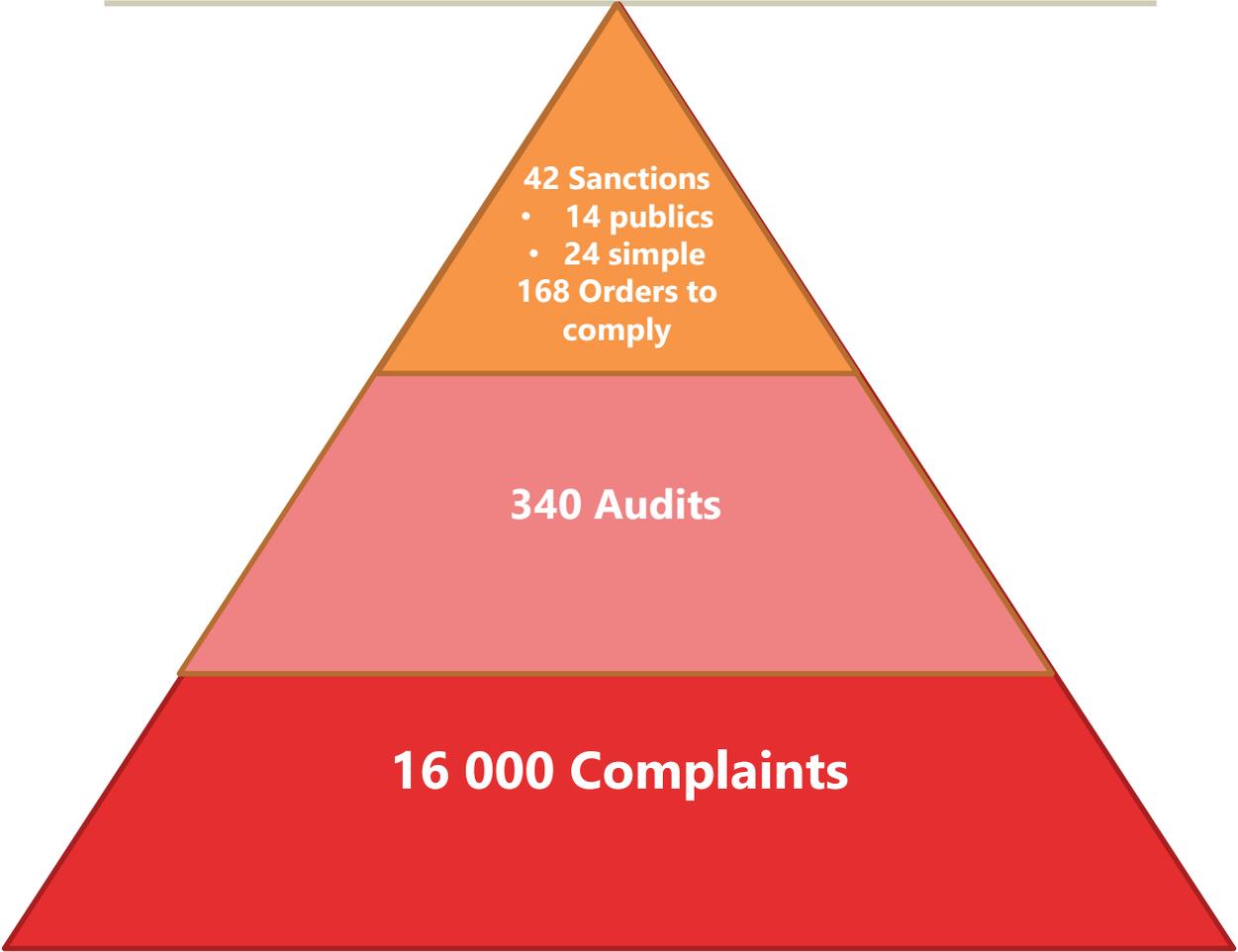
étudiées par la CNIL

6 décisions de la CNIL

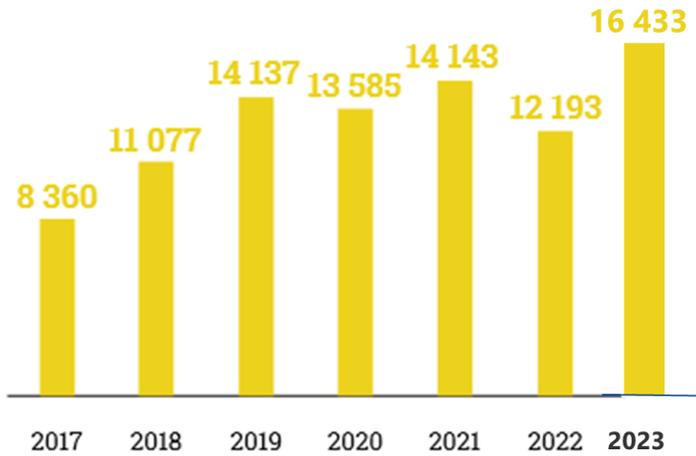
en coopération avec ses homologues

- 24 simplified sanctions (**229 500 euros**) (15 sanctions during T1 2024)

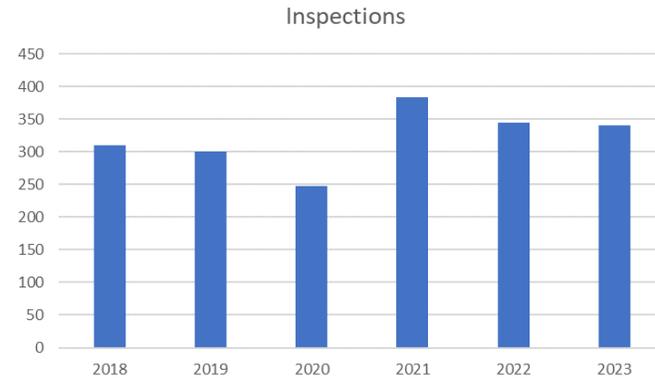
Complaint/Audit/Sanction



Summary of the evolutions

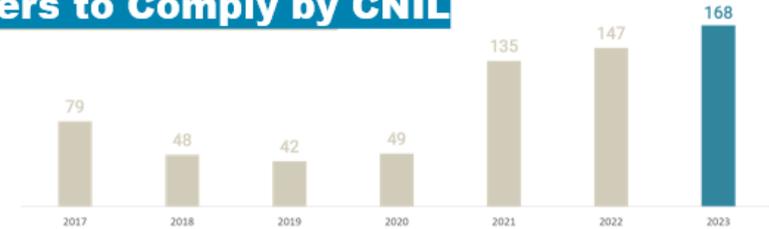


Complaints

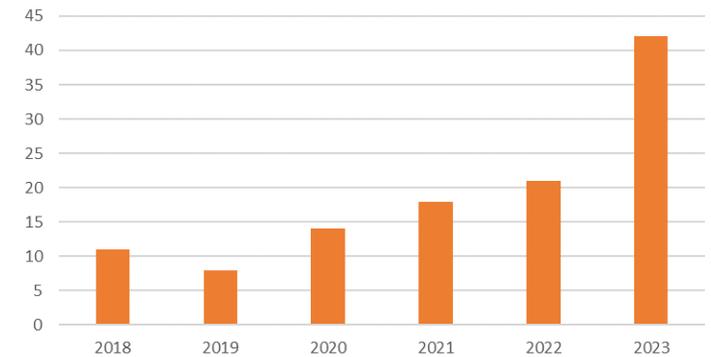


Inspections

Orders to Comply by CNIL



Orders to comply and sanctions



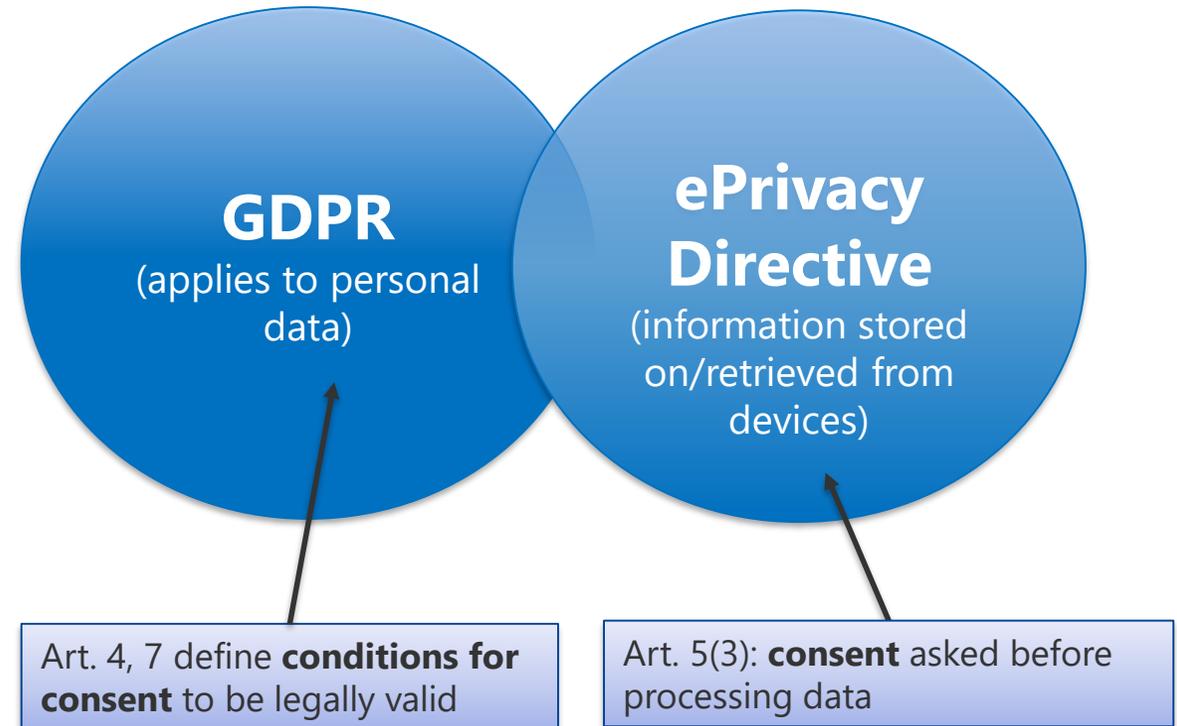
Example: Cookies & other trackers

December 2021 :

- 150 million and 60 million fines on Cookies

Main issue: several clicks are required to refuse all cookies, against a single one to accept them.

- **ePrivacy only applies to companies with one establishment in France (not necessary the main establishment)**



INFORM, PROTECT RIGHTS

The CNIL responds to requests from individuals and professionals. It carries out communication actions with the general public and professionals, whether through its networks, the press, its website, its presence on social networks or by providing educational tools.

Any person may contact the CNIL in case of difficulty in exercising their rights

SUPPORT COMPLIANCE AND ADVISE

In order to help private and public organizations to comply with the RGPD, the CNIL offers a complete toolbox adapted to their size and needs.

The CNIL ensures that solutions are found to enable them to pursue their legitimate objectives in strict compliance with citizens' rights and freedoms.

ANTICIPATE AND INNOVATE

In order to detect and analyse technologies or new uses that could have a significant impact on privacy, the CNIL carries out a dedicated watch.

It contributes to the development of privacy-protective technological solutions by advising companies as early as possible, in a "privacy by design" approach.

CONTROL AND SANCTION

The control allows the CNIL to verify the concrete implementation of the law. It can require an organization to regularize its processing (order to comply) or impose sanctions (fine, etc).

INFORM, PROTECT RIGHTS



47 111
received calls



11,8 millions
visits on the website



16 433
complaints received



20 810
indirect access right

INFORM, PROTECT RIGHTS

The CNIL responds to requests from individuals and professionals. It carries out communication actions with the general public and professionals, whether through its networks, the press, its website, its presence on social networks or by providing educational tools.

Any person may contact the CNIL in case of difficulty in exercising their rights

SUPPORT COMPLIANCE AND ADVISE

In order to help private and public organizations to comply with the RGPD, the CNIL offers a complete toolbox adapted to their size and needs.

The CNIL ensures that solutions are found to enable them to pursue their legitimate objectives in strict compliance with citizens' rights and freedoms.

ANTICIPATE AND INNOVATE

In order to detect and analyse technologies or new uses that could have a significant impact on privacy, the CNIL carries out a dedicated watch.

It contributes to the development of privacy-protective technological solutions by advising companies as early as possible, in a "privacy by design" approach.

CONTROL AND SANCTION

The control allows the CNIL to verify the concrete implementation of the law. It can require an organization to regularize its processing (order to comply) or impose sanctions (fine, etc).

Support compliance and advise

SUPPORTING COMPLIANCE & ADVISING

96,097

ORGANISATIONS APPOINTED A DATA PROTECTION OFFICER (DPO)

151

DELIBERATIONS INCLUDING 102 OPINIONS ON DRAFT TEXTS

31

PARLIAMENTARY HEARINGS

34,250

DPO APPOINTED

4,668

DATA BREACH NOTIFICATIONS

520

CASES PROCESSED IN HEALTH AND RESEARCH

INFORM, PROTECT RIGHTS

The CNIL responds to requests from individuals and professionals. It carries out communication actions with the general public and professionals, whether through its networks, the press, its website, its presence on social networks or by providing educational tools.

Any person may contact the CNIL in case of difficulty in exercising their rights

SUPPORT COMPLIANCE AND ADVISE

In order to help private and public organizations to comply with the RGPD, the CNIL offers a complete toolbox adapted to their size and needs.

The CNIL ensures that solutions are found to enable them to pursue their legitimate objectives in strict compliance with citizens' rights and freedoms.

ANTICIPATE AND INNOVATE

In order to detect and analyse technologies or new uses that could have a significant impact on privacy, the CNIL carries out a dedicated watch.

It contributes to the development of privacy-protective technological solutions by advising companies as early as possible, in a "privacy by design" approach.

CONTROL AND SANCTION

The control allows the CNIL to verify the concrete implementation of the law. It can require an organization to regularize its processing (order to comply) or impose sanctions (fine, etc).

LINC

Laboratoire d'Innovation
Numérique de la CNIL

Explore

LINC explores the future of the digital society, to better anticipate the impact of the use of technological innovations on privacy and freedoms.

Exchange

LINC creates a link between the actors of the digital society (companies, institutions, associations, civil society...), to better inform them about the new stakes linking ethics, freedom, and privacy.

Equip

The LINC adapts tools for departments and the public to inform about data use and the exercise of rights.

Experiment

LINC explores the future of the digital society, to better anticipate the impact of the use of technological innovations on privacy and freedom.

LINC: 8 members

Social Sciences



Computer Science



Design



Explore

LINC explores the future of the digital society, to better anticipate the impact of the use of technological innovations on privacy and freedoms.

How ?

Through regular publications, online and offline (Cahiers Innovation & Prospective)

Exploration on AR/VR

Enquêter et travailler dans les Métavers

01 avril 2023

*Si vous arrivez sur cette page, c'est très probablement parce que vous êtes intéressé(e) par notre **annonce pour le poste d'Enquêteur(trice) des Métavers**. Cette offre pourrait être disponible... dans le futur ! D'ici là, **vous pouvez candidater ici pour rejoindre le service des contrôles de la CNIL**.*



Mondes virtuels : vers des passeurs de frontières numériques ?

23 mai 2023

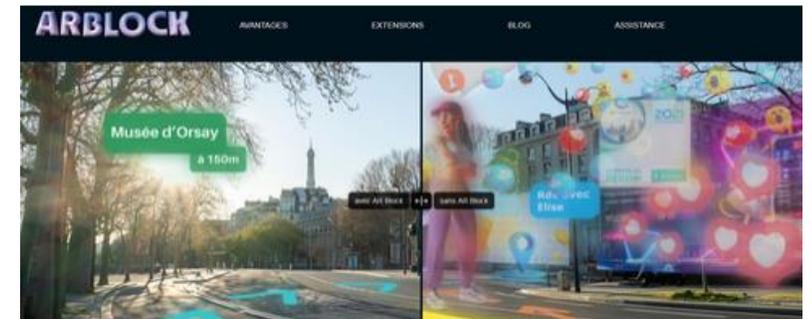
Si vous arrivez sur cette page, c'est très probablement parce que vous avez trouvé un flyer proposant des activités de "passeur numérique" pour traverser les frontières fermées des mondes virtuels. Cette activité pourrait exister... dans le futur ! Nous l'avons imaginée dans le cadre de réflexion prospective sur les futurs des métavers et mondes virtuels.



Réalité virtuelle et augmentée : vers des ARblocks ?

12 juin 2023

*Si vous arrivez sur cette page, c'est très probablement parce que vous avez souhaité acquérir un **ARblock**, "le meilleur proxy personnel et adblocker en Réalité Augmentée". Cette solution existera peut-être... dans le futur ! Nous l'avons imaginée dans le cadre de réflexion prospective sur les futurs des métavers et mondes virtuels.*



Contexte

Ces travaux font suite à une réflexion prospective menée fin 2022 par le LINC, accompagné par l'agence Fabernovel, sur les futurs des métavers. Il s'agissait d'explorer les enjeux posés par le développement de la réalité virtuelle et de la réalité augmentée, au travers des technologies, des usages, des nouveaux

<https://LINC.cnil.fr>



Cahier Innovation & Perspective

Upcoming changes :

- Bio of the members of the Lab
- Section about the Research@Linc/videos
- English version (sort of), priority to AI content

<https://LINC.cnil.fr/en>

Philippe Lemoine - Liberté des anciens, des modernes et des néo-modernes
06 octobre 2020

Discover hidden web features to observe hidden web
05 octobre 2020

Visualiser le web publicitaire avec les fichiers Ads.txt et Sellers.json
02 octobre 2020

Discover the advertising world with the Ads.txt and Sellers.json
02 octobre 2020

[Nos vies numériques en 2030] - Appel à « fragments de futurs »
07 août 2020

[Our digital lives] - Call for

LINC

Laboratoire d'Innovation Numérique de la CNIL

DOSSIERS EXPÉRIMENTATIONS PUBLICATIONS À PROPOS DE LINC

Cahier IP n°8 : Scènes de la vie numérique
Le laboratoire d'innovation numérique de la CNIL (LINC) publie son 8ème cahier Innovation et prospective.
14 avril 2021

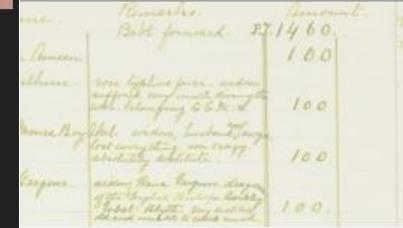


les en cours et à l'entour des données
20

Protéger la vie privée en 2030, une exploration prospective et spéculative

Données & Design par LINC CNIL
Données & Design: plateforme, outil et communauté pour les designers

COOKIE VIZ
Evaluer la protection de votre navigateur au moyen de l'extension CookieViz
05 décembre 2022



Mon Assistant CNIL
Preuve de concept d'un assistant vocal respectueux de la vie privée des utilisateurs
28 novembre 2022

BigScience : « Il faut promouvoir l'innovation ouverte et bienveillante pour mettre le respect de la vie privée au cœur de la recherche en IA »
09 novembre 2022

[Données synthétiques] - Dis papa, comment on fait les données ? 1/2
18 octobre 2022

aliser et valoriser les données de paiement : exemple de l'industrie cartes de crédit
20

« Le grand détournement » : les données de vol et les jets privés
17 octobre 2022

Summary of the first Privacy Research Day
02 octobre 2022

[Données synthétiques] - Et l'Homme créa les données à son image 2/2
18 octobre 2022

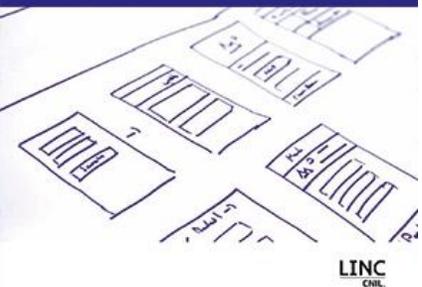
[Algaudit] 2 - Expérimenter une solution d'audit algorithmique
19 septembre 2022

[Algaudit] 1 - Choisir une solution d'audit algorithmique
18 septembre 2022

[Algaudit] 3 - Evaluer une solution d'audit algorithmique
20 septembre 2022

Shaping Choices in the Digital World

From dark patterns to data protection:
the influence of user design on user empowerment



Co-building user journeys compliant with the GDPR and respectful of privacy.



Design in the GDPR

A design approach to the regulation by looking at the GDPR key concepts that can be engaged by designers.

[DISCOVER THE KEY CONCEPTS](#)



Practical examples

Be inspired by case studies, co-constructed with the community, to implement GDPR key concepts in your digital services and products.

[SEE THE CASE STUDIES](#)



Stay informed

All the news on the activities of Data&Design to always be aware of the latest publications and know our next events to meet us.

[JOIN](#)

Exchange

LINC creates a link between the actors of the digital society (companies, institutions, associations, civil society...), to better inform them about the new stakes linking ethics, freedom, and privacy.

How ?

Through educational interventions, during private or public events, and the organization of meetings.

Research@LINC 2023-2024

6 octobre : "Clickwrap and the privacy paradox"

3 novembre : "The top-down & bottom-up race for privacy enforcement in Europe"

15 décembre : "La fabrique sociale de l'intelligence artificielle. Concevoir et mettre en œuvre une « justice prédictive »"

12 janvier : "Patients' knowledge, preferences, and perspectives about data protection and data control in health research"

17 janvier : Demi-journée de recherche **numérique adolescent** (sociologie, psychologie, info-comm)

26 janvier : "La minimisation de données dans les formulaires papier"

09 février - Les conditions d'utilisation des réseaux sociaux sous l'angle des droits de l'homme

08 mars - IA

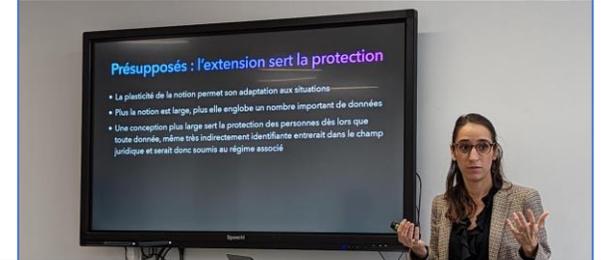
15 mars - Environnement et data center

22 mars - IA

19 avril - Differential privacy en pratique

17 mai - RGPD dans les applications mobiles

31 mai - Nanotargeting on LinkedIn



EPFL **Example of Privacy-Enhancing Technology: Secure Multiparty Computation**

- **Problem statement:**
 - A set of players $\mathcal{P} = \{P_1, P_2, \dots, P_N\}$ would like to compute a function $f(x_1, x_2, \dots, x_N) = (y_1, y_2, \dots, y_N)$ of their joint inputs.
- **Requirements:**
 1. **Privacy**
No party should learn anything more than its prescribed output.
 2. **Correctness**
Each party is guaranteed that the output that it receives is correct.
- **Realization:**
 - A multiparty cryptographic protocol



LINC collaborates with researchers

No need to ask the Android: Bluetooth-Low-Energy scanning without the location permission

Vincent Toubiana*
CNIL
France
vtoubiana@cnil.fr

Mathieu Cunche
INSA-Lyon, Inria, Université
France
mathieu.cunche@inria.fr

ABSTRACT

Bluetooth-Low-Energy (BLE) scanning can be misused to determine a device location. In order to prevent location tracking by applications, Android requires the use of some BLE functions to the prior obtention of location permission and the activation of the location setting. We detail a vulnerability that allows applications to scan without the location permission. We present a design allowing to bypass the active location requirement. Our design flaws allow an application to fully circumvent the permissions applying to BLE scanning. The presented vulnerabilities affect devices running Android 6 up to 11 and could be misused by location developers to track the location of users. This vulnerability has been disclosed to Google and assigned the CVE-2022-22116.

The Effect of Design Patterns on (Present and Future) Cookie Consent Decisions

Nataliia Bielova*
Inria research centre at Université Côte d'Azur
Anysia Nguyen
Behavioural Insights Team (BIT)
Vincent Toubiana†
Commission Nationale de l'Informatique et des Libertés (CNIL)

Laura Litvine
Behavioural Insights Team (BIT)
Mariam Chammat
Interministerial Directorate for Public Transformation (DITP)
Estelle Hary‡
RMIT University

Abstract

Today most websites in the EU present users with a consent banner asking about the use of cookies or other tracking technologies. Data Protection Authorities (DPAs) need to ensure that users can express their true preferences when faced with these banners, while simultaneously satisfying the EU GDPR requirements. To address the needs of the French DPA, we conducted an online experiment among 3,947 participants in France exploring the impact of six different consent banner designs on the outcome of users' consent decision. We also assessed participants' knowledge and privacy preferences, as well as satisfaction with the banners. In contrast with previous results, we found that a "bright pattern" that highlights the decline option has a substantial effect on users' decisions. We also find that two new designs based on behavioral levers have the strongest effect on the outcome of the consent decision, and participants' satisfaction with the banners. Finally, our

What if data protection regulators embraced foresight and speculative design?

Arianna Rossi^a, Régis Chatellier^b, Stefano Leucci^c, Rossana Ducato^d, Estelle Hary^b

^aUniversity of Luxembourg, Luxembourg

^bInnovation and Foresight Lab, CNIL, France

^cTechnology and Privacy Unit, European Data Protection Supervisor, Belgium

^dSchool of Law, University of Aberdeen; Faculté de droit et de criminologie, UCLouvain.

*Corresponding e-mail: arianna.rossi@uni.lu

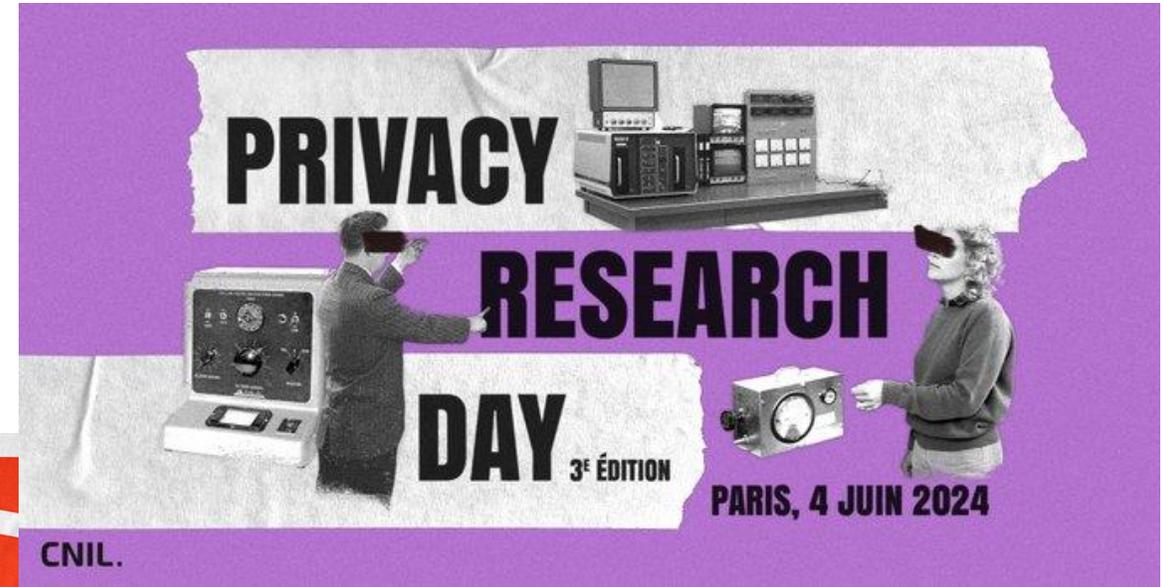
doi.org/10.21606/drs.2022.681

digital technological advancements and the growing "datafication" of society, duals' privacy constitutes an increasingly explored speculative design approach, researchers, practitioners, designers and artists. This article explores a national and an international data protection authority (the Commission Nationale de l'Informatique et des Libertés - CNIL - and the European Data Protection Supervisor - EDPS - respectively), where foresight methods are employed in policy-making with the goal of anticipating and addressing their implications for society and their impact on regulations, as well as existing and upcoming laws on emerging technologies. Such foresight strategic proactive abilities, raise public awareness of privacy and encourage a participatory approach to the design of policies. They can also contribute to the education and practice of legal design.

Although consent banners are a means massively adopted by the industry to collect such legally-required consent, in practice, their usage raises numerous issues from both a regulatory and a behavioral stand-point.

From a regulatory perspective, EU Data Protection Authorities that are in charge of enforcing the GDPR and – for some of them – ePrivacy, help websites to comply by providing high-level guidelines and practical recommendations. The French Data Protection Authority (CNIL) has recently updated its guidelines [13] and recommendations [14] regarding the use of cookies and other tracking technologies, and consent banner interfaces. While providing more concrete recommendations, regulators still need to ensure that users can reflect their true preferences in the banner interface, thus making "freely given, specific, informed and unambiguous indication of the data subject's wishes", requested by the GDPR [66, Art.4]. However, no definite proof exists today

Privacy Research Day



CNIL-Inria Privacy Award



Exchange

Pinging companies when they are not reacting to research

- **Researchers have responsible disclosure approaches, but Data Controller do not always react appropriately**
- **In (at least) one instance, we reached to a company to ask them to react to a research paper**
- **We could/should do more**

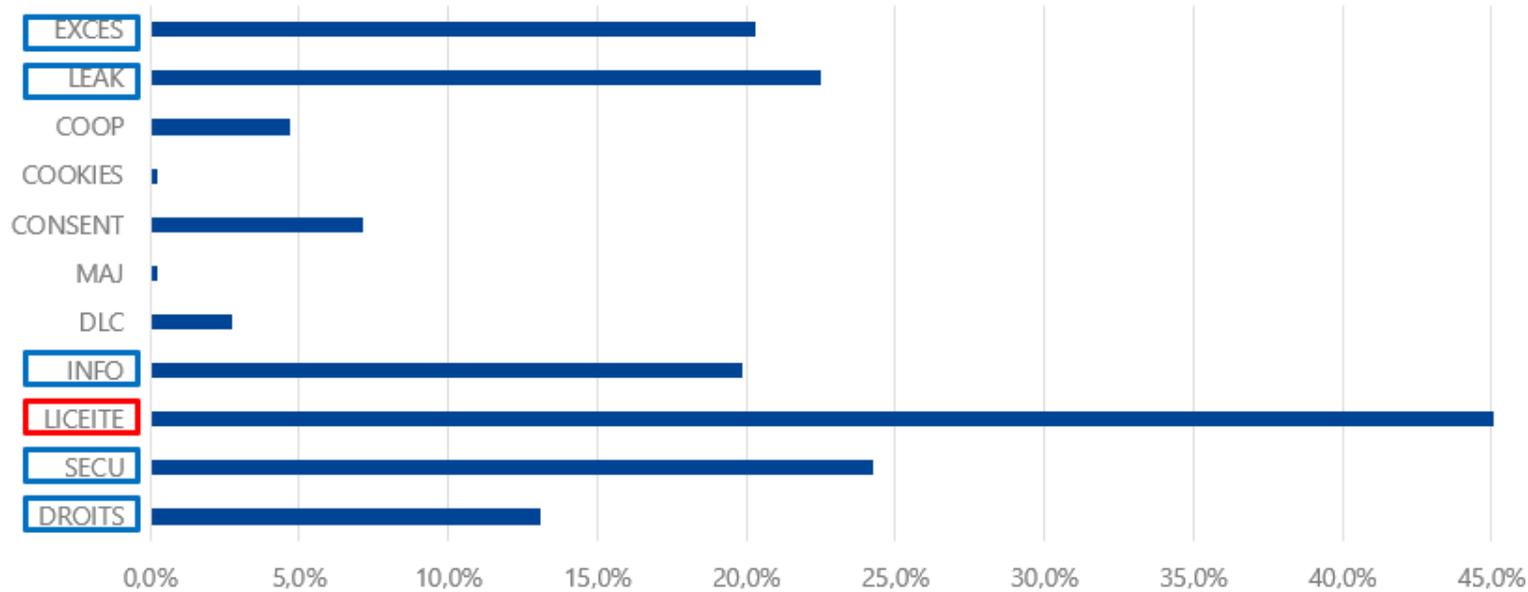
Equip

The LINC adapts tools for departments and the public to inform about data use and the exercise of rights.

How ?

“In-house” development and monitoring of existing projects

Benchmark of fines



```
Call:
lm(formula = I$MONTANT ~ I$LICEITE + I$DROITS + I$SECU + I$INFO +
  I$CONSENT + I$LEAK + I$EXCES + I$i..ORG + I$TAILLE + I$PUB,
  data = I)

Residuals:
    Min       1Q   Median       3Q      Max
-9264.8  -481.5  -163.9   277.7  7772.3

Coefficients:
              Estimate Std. Error t value Pr(>|t|)
(Intercept)   -6185.62    2243.05  -2.758  0.00737 **
I$LICEITEInvoque  5776.96     840.74   6.871  1.91e-09 ***
I$DROITSInvoque  6190.62     912.40   6.785  2.75e-09 ***
I$SECUIInvoque  5023.03    1051.95   4.775  9.19e-06 ***
I$INFOInvoque  -2110.63     976.32  -2.162  0.03396 *
I$CONSENTInvoque 15036.94    1314.64  11.438 < 2e-16 ***
I$LEAKInvoque   -727.60    1033.52  -0.704  0.48370
I$EXCESInvoque  2258.42     901.56   2.505  0.01451 *
I$i..ORGPublic  175.61     2514.77   0.070  0.94452
I$i..ORGASso    472.32    2696.96   0.175  0.86147
I$i..ORGIndividu 428.66    3015.76   0.142  0.88737
I$i..ORGService 1294.28    2515.21   0.515  0.60842
I$i..ORGCommerce -321.16    2497.53  -0.129  0.89804
I$i..ORGIT      -48.82     2854.29  -0.017  0.98640
I$i..ORGPresse -1316.47    2756.27  -0.478  0.63436
I$i..ORGsanté   293.42    2507.58   0.117  0.90717
I$TAILLETPe    -445.39     955.19  -0.466  0.64242
I$TAILLEPME    -331.34    1106.15  -0.300  0.76539
I$TAILLEETI    1681.83    1050.81   1.601  0.11387
I$TAILLEGrosse entreprise 2284.16    1080.08   2.115  0.03791 *
I$PUBoui       312.92    1215.25   0.257  0.79753
---
Signif. codes:  0 '***' 0.001 '**' 0.01 '*' 0.05 '.' 0.1 ' ' 1

Residual standard error: 2049 on 72 degrees of freedom
Multiple R-squared:  0.7668,    Adjusted R-squared:  0.702
F-statistic: 11.84 on 20 and 72 DF,  p-value: 1.521e-15
```

Italie

Automating the analysis of fines

- ❑ There is no exhaustive databased about GDRP (and ePrivacy) fines in Europe
- ❑ Several initiatives: GDPRHub (Noyb), Enforcement tracker, GDPRXive
- ❑ GDPRXive is an open source research project crawling DPAs website to collect data
 - Analysis of the sanction must be done manually
 - We're working on automatizing this (with LLMs)



GDPRxIV (a portmanteau of GDPR + arXiv, pronounced as G-D-P-archive) is an open-source information archival system that collects and curates GDPR enforcements, judgements, opinions, reports, and guidances from all official GDPR sources. We welcome you to learn more about our [research](#), browse our [source code](#), download the entire corpora, or simply explore the enforcement viewer below. The current view reflects all the enforcements between 25-May-2018 and 26-Jun-2023.

Enforcement Database

Country	Decision Date	Fine (in €)	Decision	Company	Quoted Article	Source
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
sweden	06/26/2023	1,098,571	administrative penalty fee	Bonnier	13, 6	Link
spain	06/23/2023	300	infringement	unnamed	5	Link
spain	06/23/2023	0	file the procedure	unnamed	6	Link

Automatic transcription and translation

- Utilizing WhisperLive for real time transcription
- Ctranslate for translation from English to French
- Almost used it for PRD

Pourquoi pas eu de recherche sur la protection de la vie privée sur iOS depuis une bonne dizaine d'années ?

- Beaucoup de **code propriétaire sur iOS** – contrairement à Android

Par exemple, vous pouvez vous demander, Pourquoi y a-t-il tellement moins de recherches sur la vie privée sur iOS que sur Android ? Et je faisais une sorte d'allusion à ça.

Map of health data store

ENTREPÔTS DE DONNÉES DE SANTÉ

Cartographie des acteurs responsables d'EDS en France

Qu'est qu'un EDS ?

À propos de ce dossier

Ressources

Les entrepôts de données de santé sont des bases de données utilisées à des fins de recherches, d'études ou d'évaluation dans le domaine de la santé. Cette cartographie répertorie les acteurs qui en sont responsables en France.

🕒 Dossier mis à jour le 25/01/2024

Leur mise en œuvre est encadrée par la CNIL et peut-être soumise à son autorisation.

Chronologie de création des EDS



Année affichée : 2023

Chacun des **68 acteurs déclarés** met en œuvre un ou plusieurs EDS. **79 entrepôts** au total sont recensés en France.

Typologies d'acteurs

36 acteurs **Publics**

CHU, Agences publiques, ...

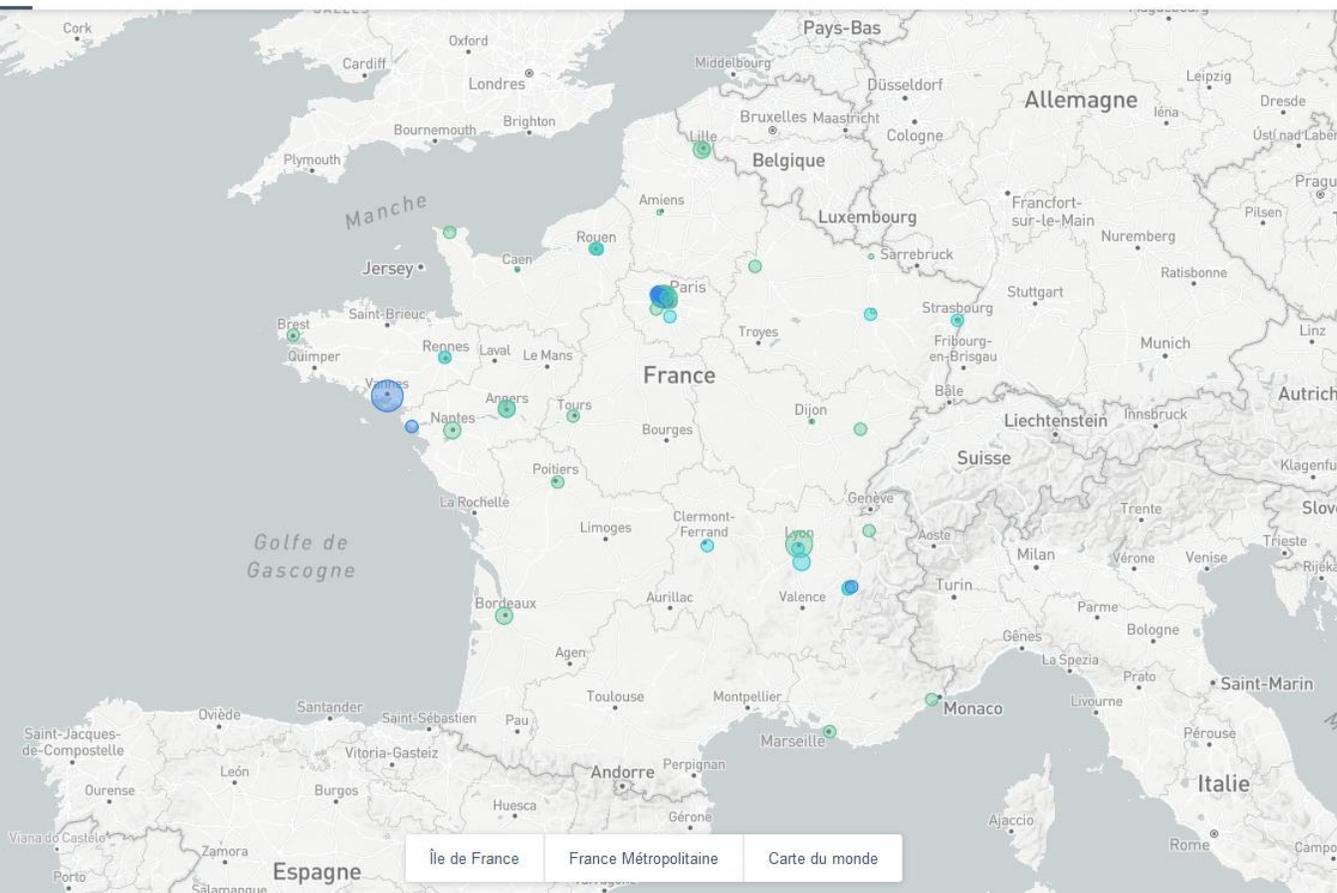
18 acteurs **Privés**

Cliniques et entreprises

20 acteurs **Privés à but non lucratif**

Associations, ESP, CLCC, ...

Acteurs en réseau

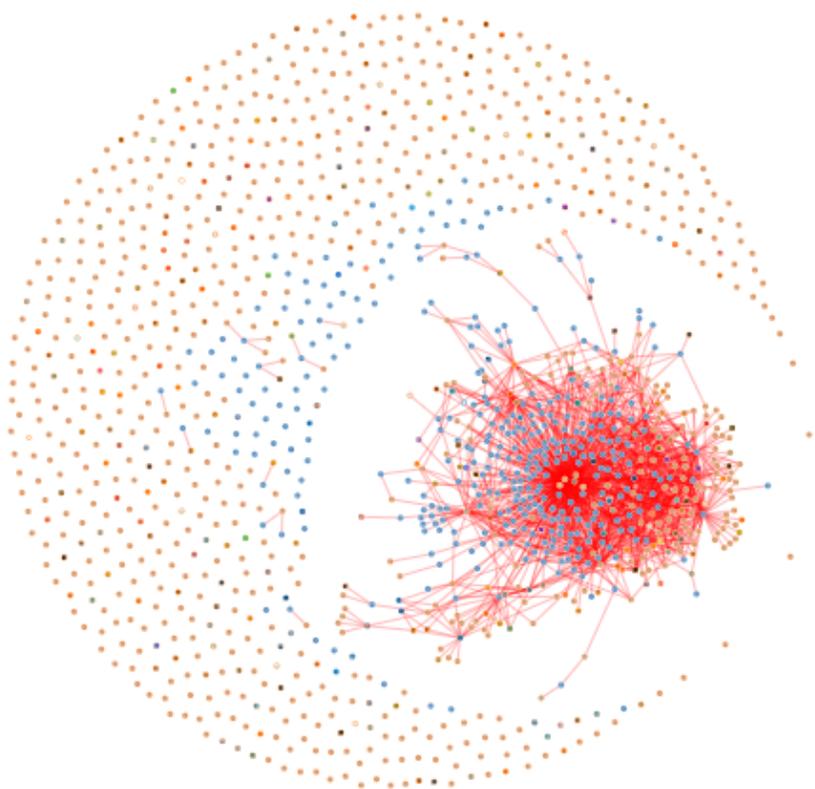


Your navigation

You have visited **379 websites**.

79% of them stored at least one cookie.

These cookies potentially **exchange** information with **243 third parties**.

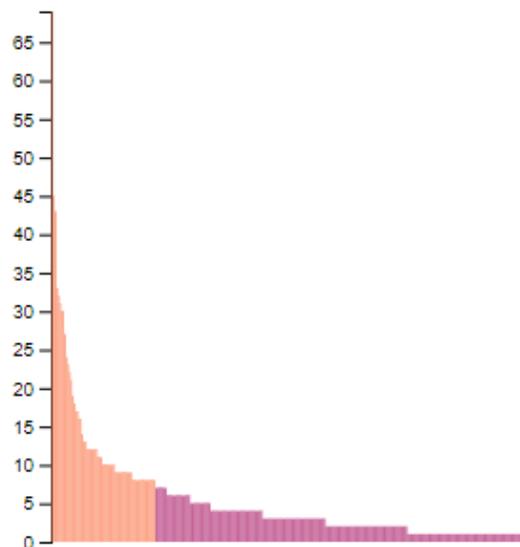


Presence of third parties on websites

During your navigation, third parties may deposit cookies to, among other things, track navigation. Between **69 and 8 third parties** are present on 20% of websites.

Between **8 and 1 third parties** are present on 80% of websites.

Between **1 and 1 third parties** are present on 20% of websites.



Presence of third parties

Use of cookies

CookieViz

<https://linc.cnil.fr/fr/cookieviz-2-new-features-observe-hidden-web-practices>

<https://github.com/LINCnil>

LINC
CNIL.

The cookies observatory

- **October 2020** : Publication of new guidelines on cookies
- **March 2021** : End of the grace period
- **From January 2021 to September 2022** : We monitored the top 1000 websites to see how many cookies were set and observe the effect of enforcement
- **In 2021**, 90 websites received an order to comply:
 - About 80% complied almost immediately
- **Browser comparison** : <https://linc.cnil.fr/comparaison-navig/>

Design Patterns

21 design patterns propose various ways to implement the principle of transparency within the interfaces and user journeys of digital services.

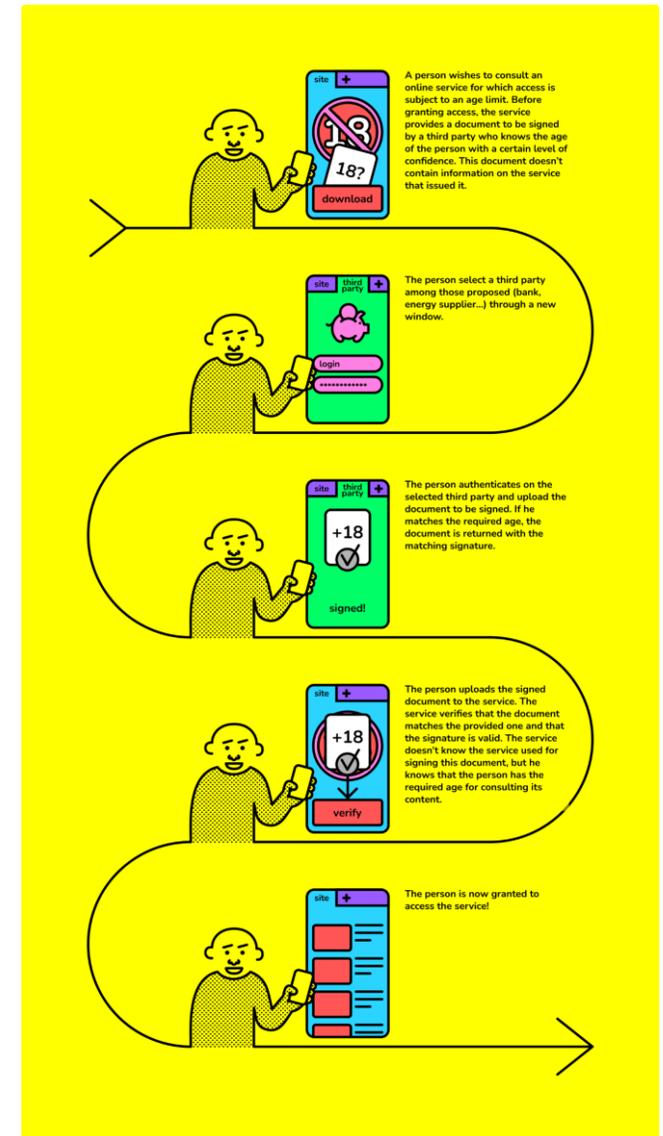
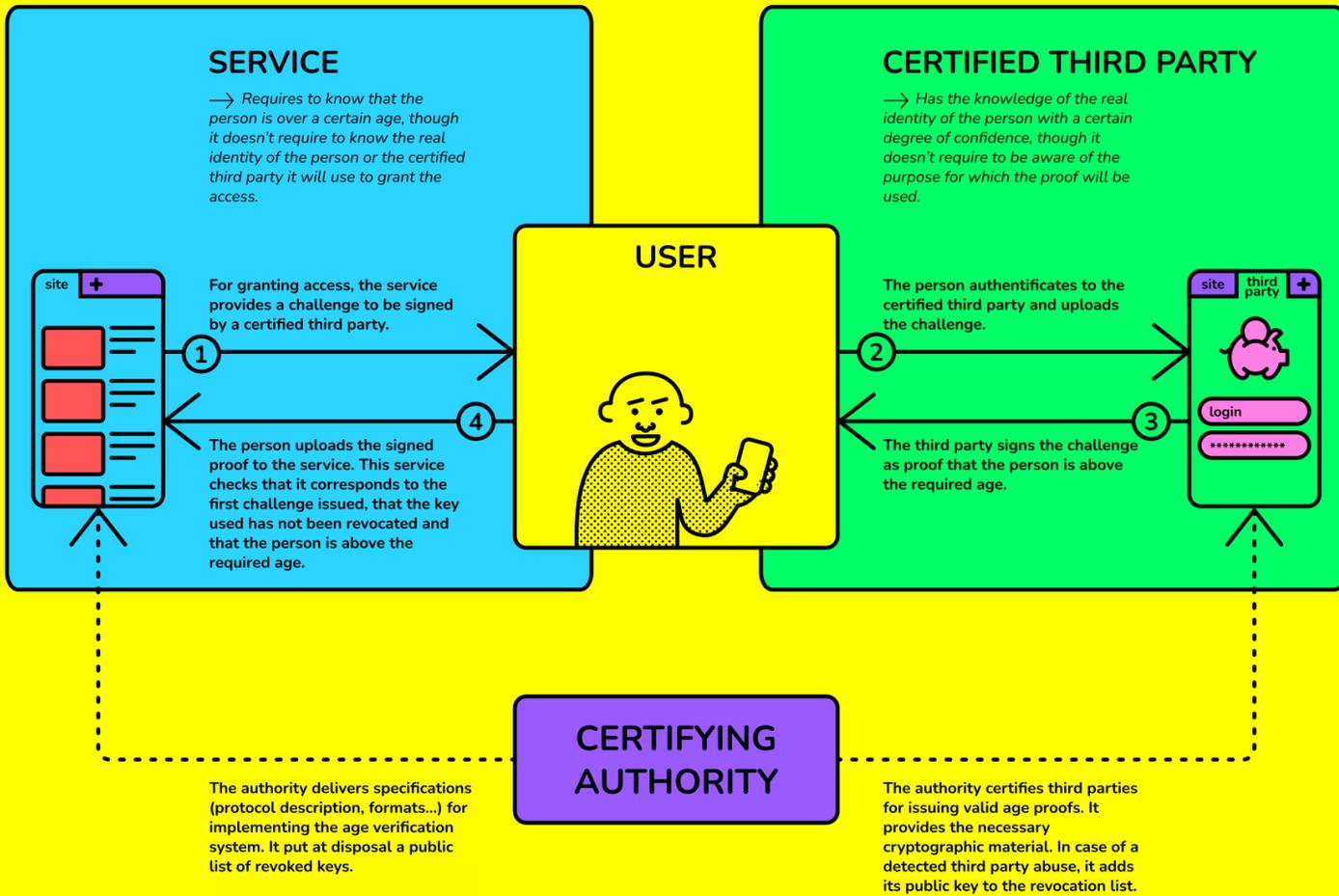
<https://design.cnil.fr/en/design-patterns/>

Experiment

LINC explores the future of the digital society, to better anticipate the impact of the use of technological innovations on privacy and freedom.

How ?

Through the prototyping of tools, services and concepts around data.

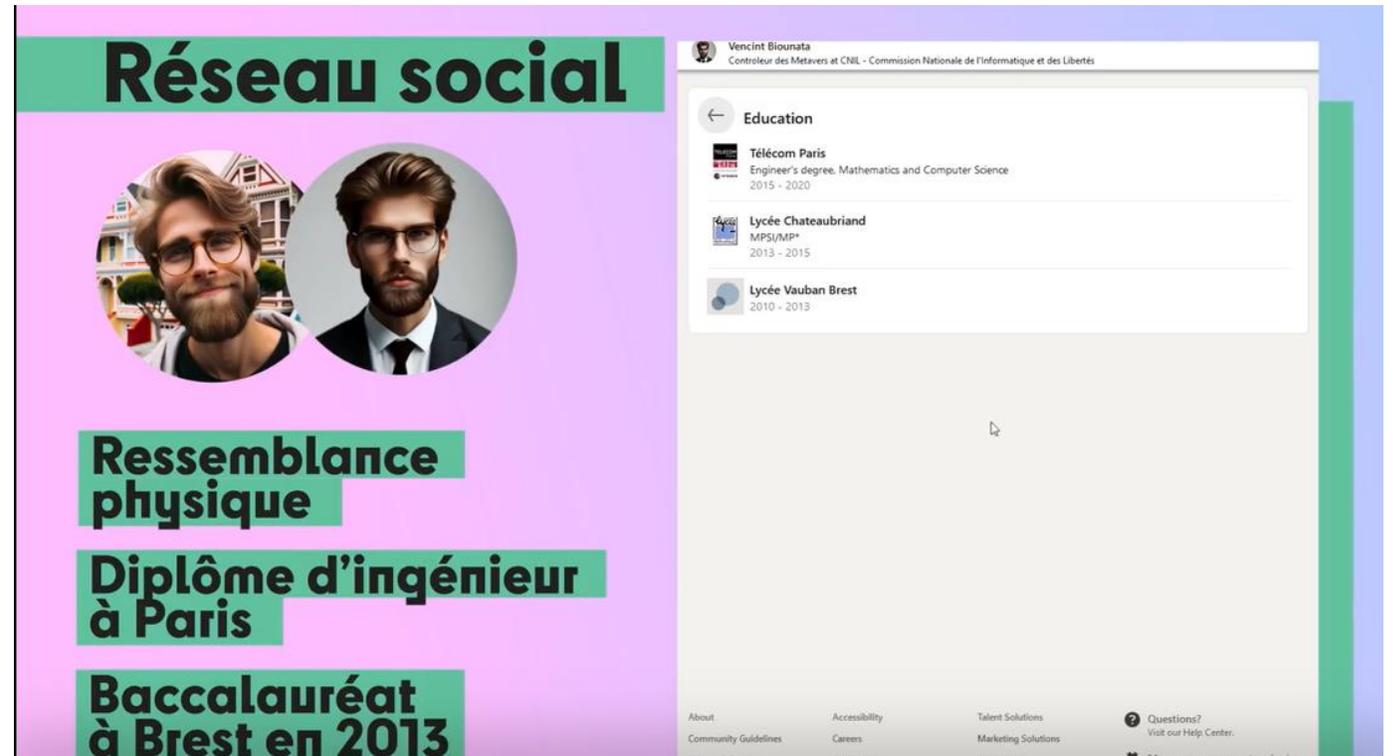


Age verification prototype

❑ Based on a real OSINT challenge

❑ Anonymized using generated pictures

❑ Quite effective



<https://linc.cnil.fr/le-renseignement-en-sources-ouvertes-faire-le-lien-entre-vos-activites-sur-le-web>

OSINT Example

LINC

**"Personal data protection: a sport for the rich?"
Survey of complaints received by CNIL**



Source : <https://linc.cnil.fr/la-protection-des-donnees-est-elle-un-sport-de-riches>

Approach and issues

Why do individuals stand up (or not) for their rights to protect their personal data?

What is the socio-demographic profile of people who contact CNIL?

What difficulties can they encounter in exercising their rights?

Analysis of complaints

Qualitative analysis of complaints received by mail in may 2016 and may 2019 (about 2 000 complaints overall)

Statistical survey

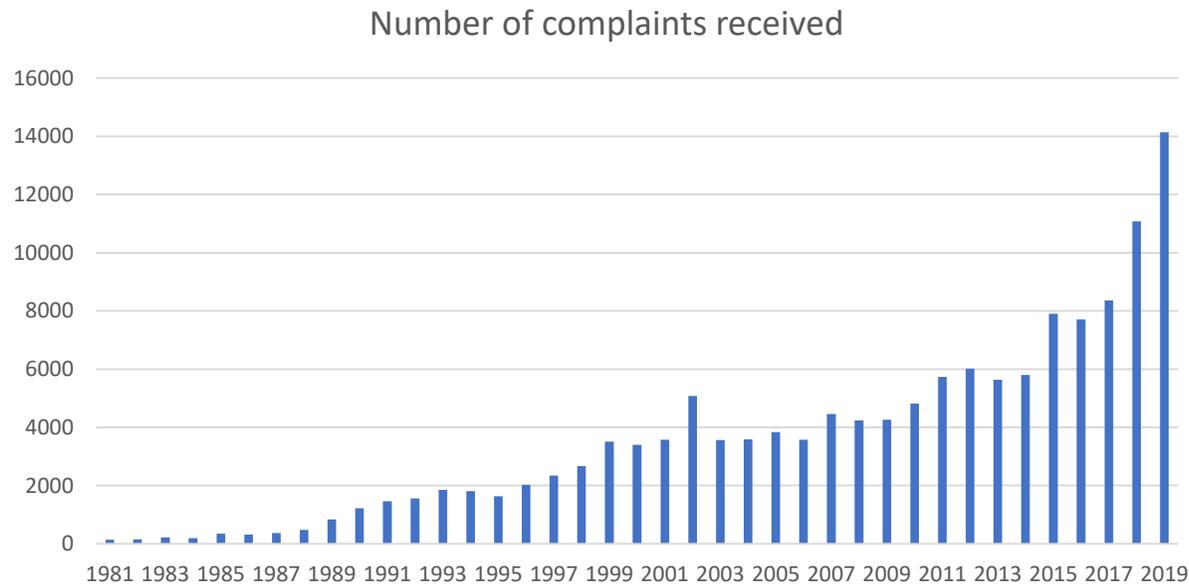
Optional questionnaire at the end of the online complaint form from 15 February to 18 April 2021

284 respondents (around 20% of complaints received over the same period)

Qualitative interviews

105 telephone interviews, lasting between 15 and 60 minutes, conducted in March and April 2021

Problematic situations



Complaints almost exclusively from individuals, rarely brought by an organisation (trade unions, associations, lawyers, etc.).

Complaints as part of people's daily lives: work has historically been a source of complaints

Problem situations and individual complaints

LINC

Experiment : the impact of cookie banner design on consent rate



Sources : <https://sciencespo.hal.science/INSA-GROUPE/hal-04235032v1> & <https://linc.cnil.fr/etude-protection-des-donnees-et-cookies-leclairage-des-sciences-comportementales>

Your cookie preferences

Our site and our partners use cookies that are placed on your device.

Some of these cookies are said to be **essential** and are strictly necessary for the proper technical functioning of the site. They include tracers that **enable audience measurement**.

If you consent, **non-essential** cookies may also be placed (you may withdraw your consent at any time). They are used to:

- accurately measure your interactions with the site in order to improve our services;
- display multimedia content from other sites;
- display personalised advertising based on your profil and browsing history;
- share content on the social networks included on our site (e.g. Facebook).

Accept all

Decline all

[Customise my choices](#)

Your cookie preferences

Our site and our partners use cookies that are placed on your device.

Some of these cookies are said to be **essential** and are strictly necessary for the proper technical functioning of the site. They include tracers that **enable audience measurement**.

If you consent, **non-essential** cookies may also be placed (you may withdraw your consent at any time). They allow:

- to accurately measure your interactions with the site in order to improve our services;
- display multimedia content from other sites;
- display personalised advertising based on your profil and browsing history;
- share content on the social networks included on our site (e.g. Facebook).

Accept all

[Customise my choices](#)

Your cookie preferences

Our site and our partners use cookies that are placed on your device.

Some of these cookies are said to be **essential** and are strictly necessary for the proper technical functioning of the site. They include tracers that **enable audience measurement**.

If you consent, **non-essential** cookies may also be placed (you may withdraw your consent at any time). They are used to:

- accurately measure your interactions with the site in order to improve our services;
- display multimedia content from other sites;
- display personalised advertising based on your profil and browsing history;
- share content on the social networks included on our site (e.g. Facebook).

Accept all

Decline all

[Customise my choices](#)

Your cookie preferences

Our site and our partners use cookies that are placed on your device.

Some of these cookies are said to be **essential** and are strictly necessary for the proper technical functioning of the site. They include tracers that **enable audience measurement**.

If you consent, **non-essential** cookies may also be placed (you may withdraw your consent at any time). They are used to:

- accurately measure your interactions with the site in order to improve our services;
- display multimedia content from other sites;
- display personalised advertising based on your profil and browsing history;
- share content on the social networks included on our site (e.g. Facebook).

Decline all

Accept all

[Customise my choices](#)

Your cookie preferences

Our site and our partners use cookies that are placed on your device.

Some of these cookies are said to be **essential** and are strictly necessary for the proper technical functioning of the site. They include tracers that **enable audience measurement**.

If you consent, **non-essential** cookies may also be placed (you may withdraw your consent at any time). They are used to:

- accurately measure your interactions with the site in order to improve our services;
- display multimedia content from other sites;
- display personalised advertising based on your profil and browsing history;
- share content on the social networks included on our site (e.g. Facebook).

Accept to be traced

Continue without being traced

[Customise my choices](#)

Your cookie preferences

Our site and our partners use cookies that are placed on your device.

Some of these cookies are said to be **essential** and are strictly necessary for the proper technical functioning of the site. They include tracers that **enable audience measurement**.

If you consent, **non-essential** cookies may also be placed (you may withdraw your consent at any time). They are used to:

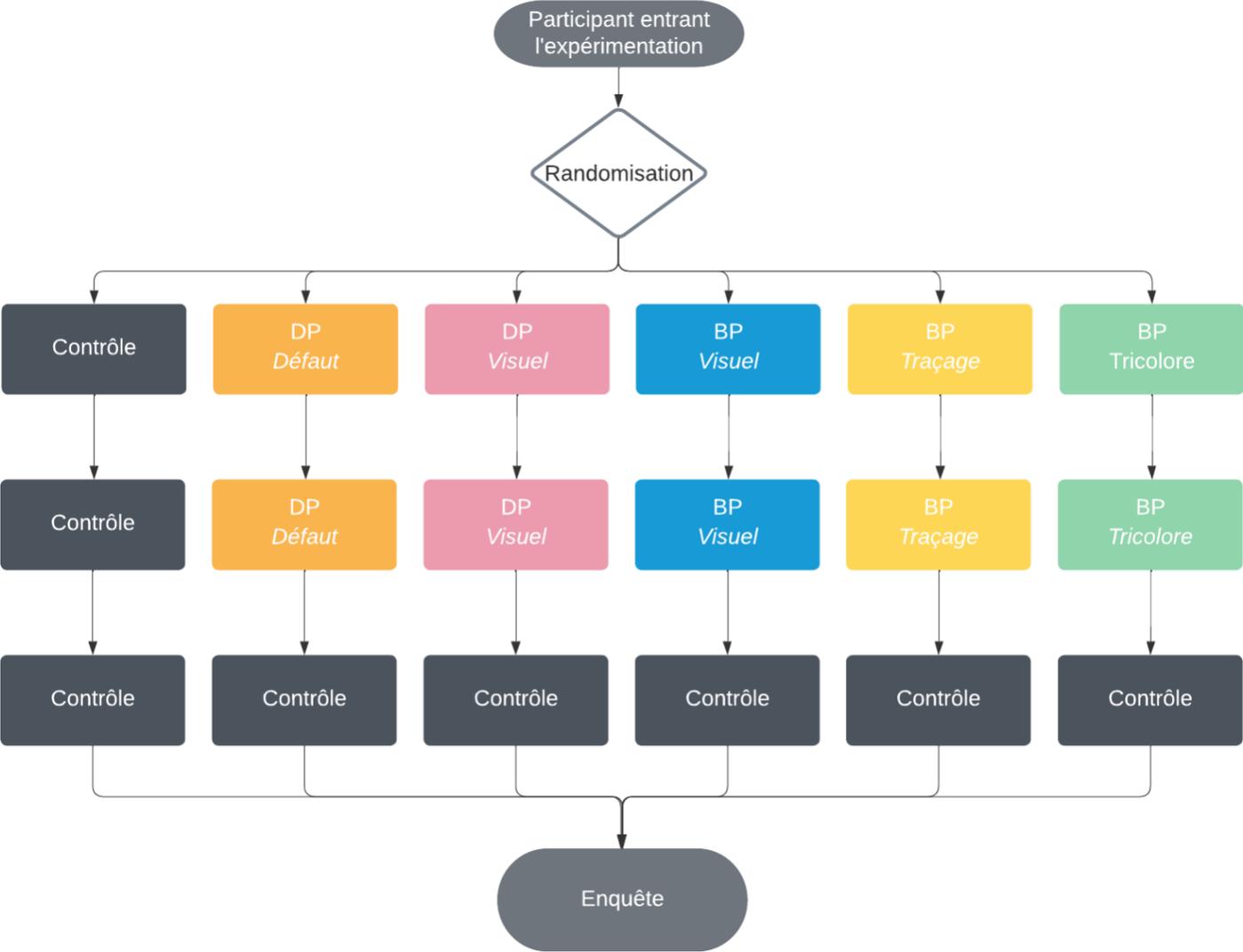
- accurately measure your interactions with the site in order to improve our services;
- display multimedia content from other sites;
- display personalised advertising based on your profil and browsing history;
- share content on the social networks included on our site (e.g. Facebook).

Decline all

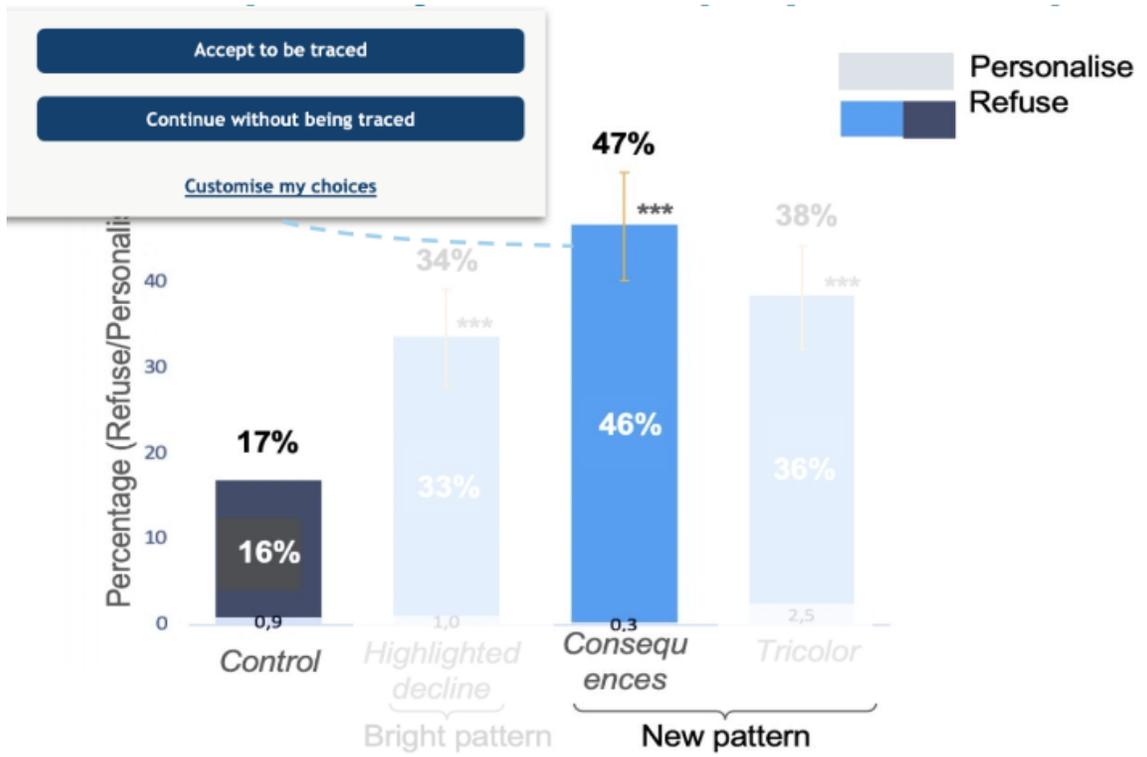
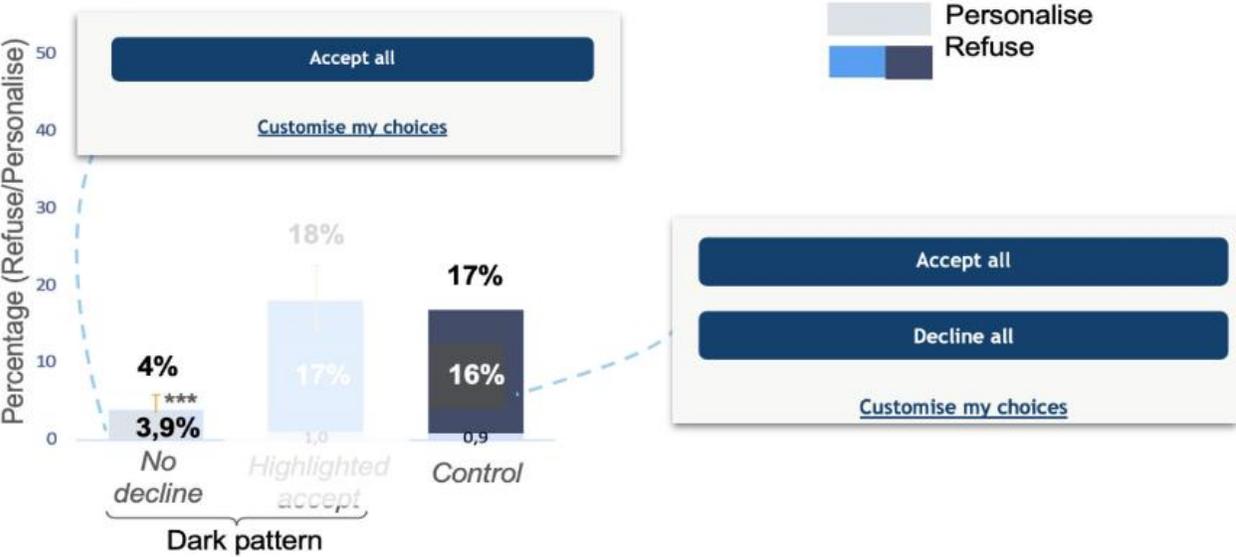
Customise my choices

Accept all

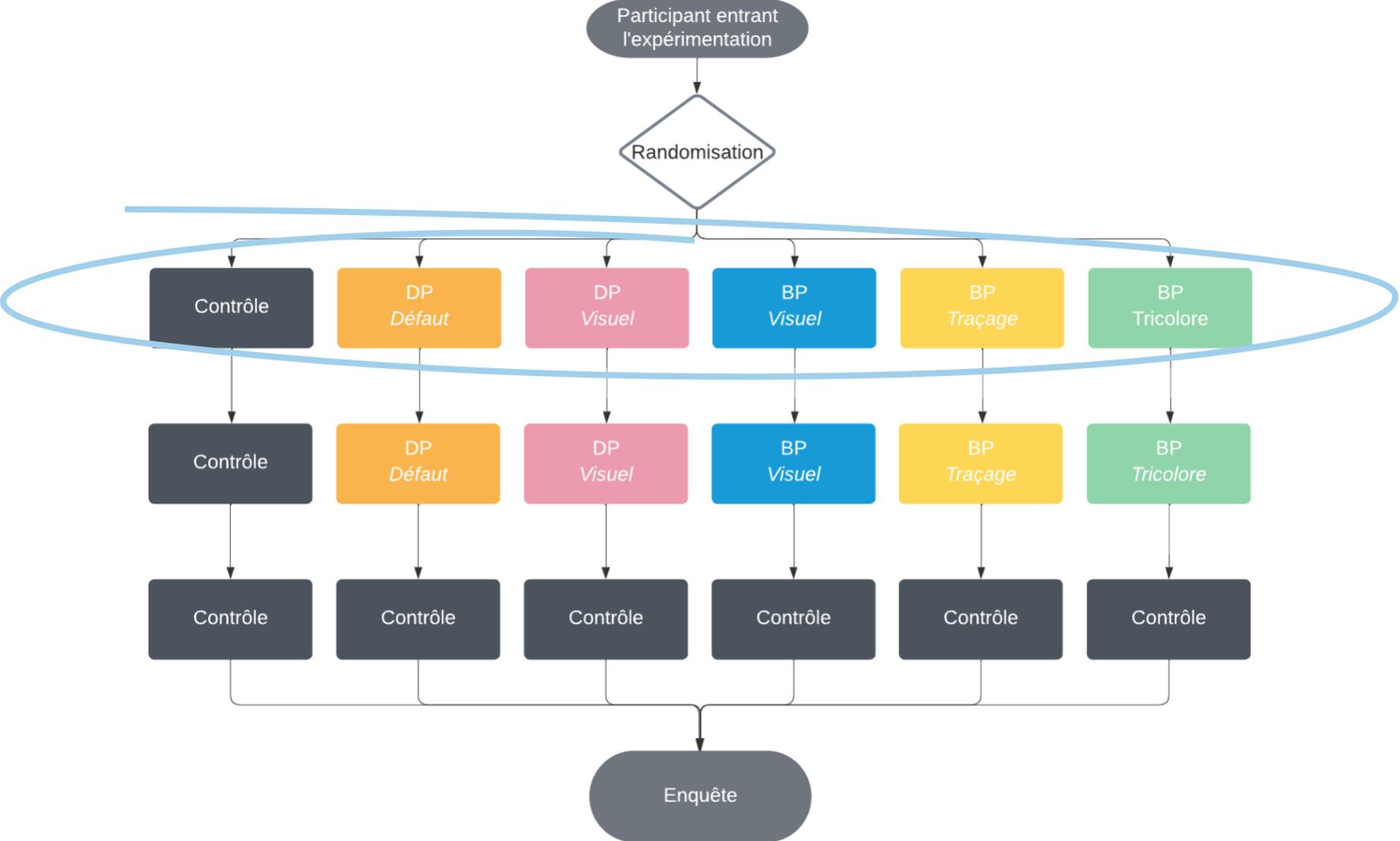
Experimental design



Impact of the design of cookie banners



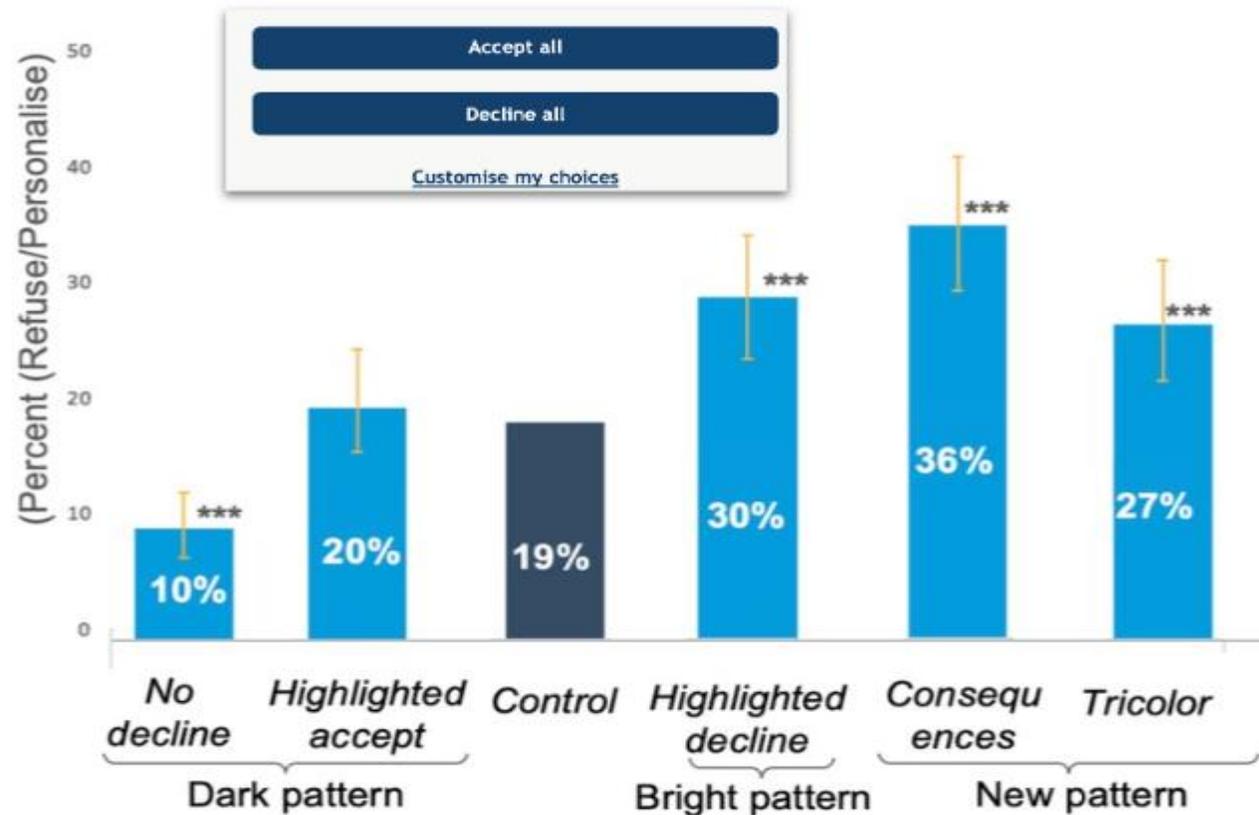
User habituation and how dark and bright patterns influence future choices



Seeing two banners containing bright patterns increases the likelihood of clicking on "refuse" on the next banner, even when the banner is neutral.

Main observation

The adoption of bright pattern, even by a small number of (hopefully influential) sites, **could therefore be enough to generate new habits.**



N=3 947
Exploratory analysis carried out on the choices made by individuals when faced with the first banner (#1) and the third banner (#3), controlling for age, gender, level of education and employment status.

Follow up

- Testing eye tracking on different cookies banners
- Creating a virtual room with different cookie banners

LINC

**Reidentification or location dataset :
from theory to practice**



Why

 **Martin Gundersen**
@martingund

The Danish DPA opened an investigation into Huq following a media report. On behalf of Danish TV 2 a company bought historical location data collected from 60.673 phones. It only cost 4800 euro for a year of data.

Article in Danish:

C'est l'histoire d'un prêtre qui rentre de
de l'importance de l'anonymisa

FTC Sues 'Massive' Data Broker for Selling Location Info on Abortion Clinics

In its lawsuit, the FTC describes how with a sample of data obtained from Kochava it was possible to pinpoint a device that visited a women's reproductive health clinic and then trace that phone back to a single family home.

 By [Joseph Cox](#)

August 29, 2022, 6:36pm [Share](#) [Tweet](#) [Snap](#)



Twelve Million Phones, One Dataset, Zero Privacy

By [Stuart A. Thompson](#) and [Charlie Warzel](#)

DEC. 19, 2019

[Share full article](#)

EVERY MINUTE OF EVERY DAY, companies — largely unre logging the movements of tens phones and storing the informa Times Privacy Project obtained most sensitive ever to be review than 50 billion location pings fro



IMAGE: CATHRYN VIRGINIA

MOTHERBOARD
TECH BY VICE

Leaked Location Data Shows Another Muslim Prayer App Tracking Users

Florida Prison System Bought Location Data from Apps

The Florida Department of Corrections is the first reported state agency based location tracking tech.

 By [Joseph Cox](#)

March 10, 2021, 3:00pm [Share](#) [Tweet](#) [Snap](#)



How to get a location dataset?



buy location data



Tout

Images

Vidéos

Actualités

Carte

Shopping

Paramètres



France

Filtre parental : modéré

Date indifférente

<https://www.safegraph.com> > guides > buy-location-data

Where to Buy Location Data: Best Providers for the Top 9 Types

Check out the type of data you're looking for, and learn about the best place to acquire it based on your needs and what you're using it for. If you need to learn about the top 9 types of location data in more detail, check out our detailed guide on Geospatial Data Types and How You Can Use Them.

<https://datarade.ai> > data-categories > mobile-location-data

Mobile Location Data: Best Datasets & Databases 2023 | Datarade

Mobile location data relates to the geographic coordinates of mobile and cell devices. It's mostly used by retailers and marketers e.g in location-based advertising and store location optimization. Datarade helps you find the right mobile location data providers and datasets. Learn more.

How to get a free location data?

 ★ 4.7 (5)	Redmob: Mobility Data Mobile Location Data for 1.5 Billion Devices - Global (GPS Location Data) by Redmob Enhance your products and services using our global location data covering over 1.5 billion devices. ... Using our extensive location dataset, you can unearth concealed patterns, conduct rapid analyses, and 387B IP location records 0 days of historical data 100% GPS	Starts at \$50,000 / year Free sample preview ✓ Free sample available View Product →
 ★ 5.0 (17)	Location Data Global Store Location Data on 41M+ POI SafeGraph Places by SafeGraph This data can be joined with other SafeGraph data on building footprint and listing information, including ... SafeGraph Places provides business location data for every location in the SafeGraph product suite via 11M POI (Points of Interest) 2 years of historical data	Starts at \$179 / purchase Free sample preview ✓ Free sample available View Product →
 ★ 5.0 (3)	Onemata Global Raw Mobile Location Data - Global Location Data - GPS-Derived Raw Mobile Location Data by Onemata : -Providing quality location data. ... data feed. 9B Average Daily Pings (Global) 18 months of historical data 100% Satisfaction Guarantee	Pricing available upon request Free sample preview ✓ 10% Datarade discount ✓ Free sample available View Product →

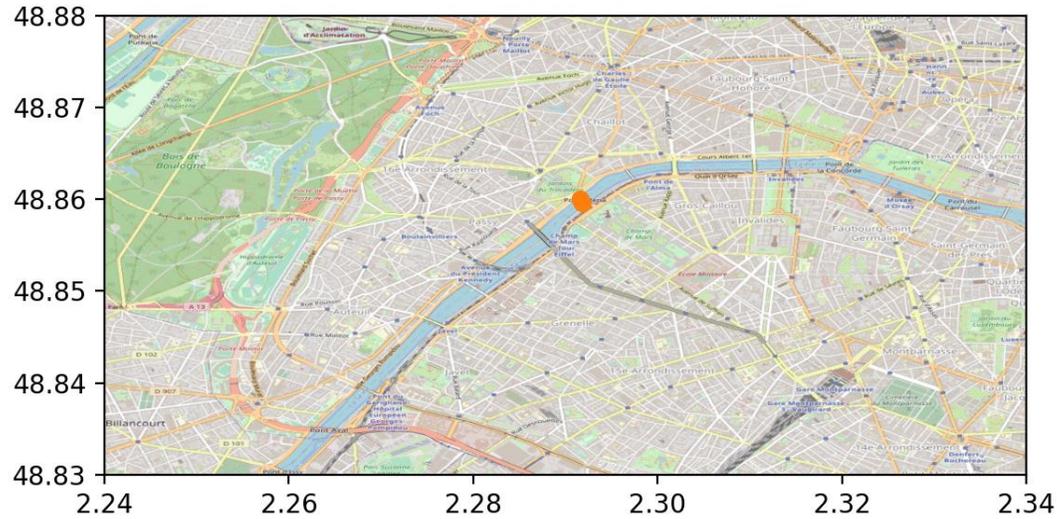
Dataset in number:

- 5 millions identifiers
- 1 week of data collection(8 au 15 octobre 2021)
- 100 millions geolocation

After data cleaning

- 800.000 identifiers with 20+ location points
- 20.000 identifiers with 1000+ location points

Paris 20 Km race

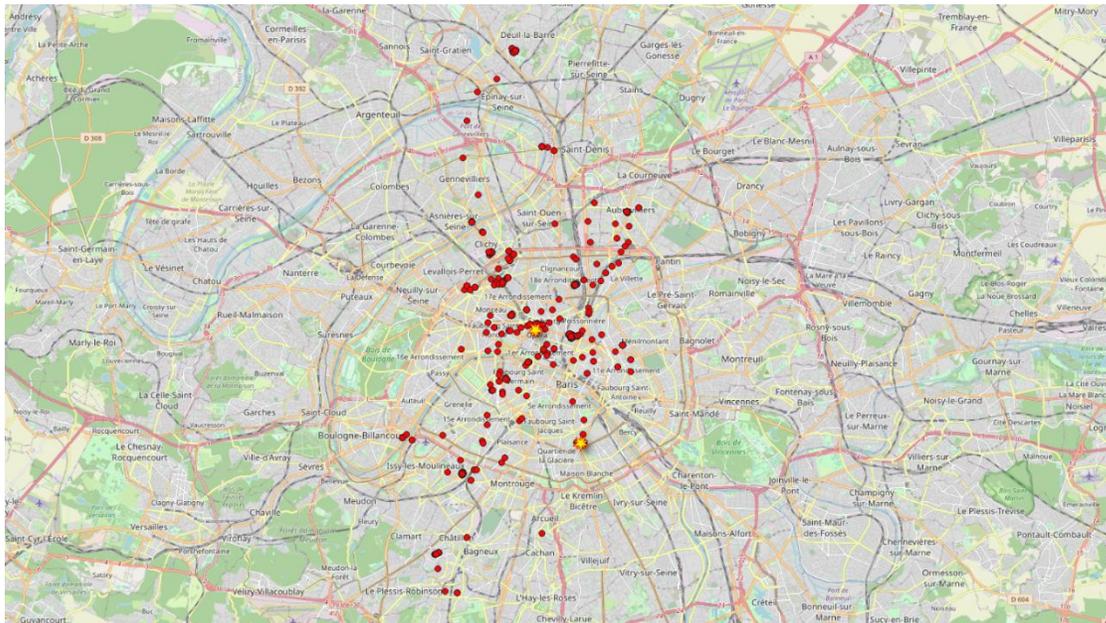


Place au Scratch	Nom	Prénom	Dossard	Nationalit	Sexe	Tps Final	Tps 5KM	Tps 10KM	Tps 15KM	Catgorie
1				FRA	H	0:57:54	0:14:47	0:28:52	0:43:18	SEM
2				KEN	H	0:57:57	0:14:47	0:28:53	0:43:17	M40
3				KEN	H	0:59:22	0:14:47	0:28:53	0:43:30	SEM
4				FRA	H	1:02:22	0:15:53	0:31:02	0:46:40	SEM
5				FRA	H	1:02:28	0:15:52	0:31:02	0:46:40	SEM
6				FRA	H	1:02:33	0:15:53	0:31:02	0:46:40	M35
7				MAR	H	1:03:05	0:15:49	0:31:02	0:46:57	SEM
8				FRA	H	1:04:24	0:17:02	0:33:01	0:48:54	SEM
9				FRA	H	1:04:36	0:15:53	0:31:30	0:48:03	SEM
10				FRA	H	1:04:37	0:16:20	0:32:07	0:48:25	SEM
11				FRA	H	1:04:39	0:16:19	0:32:07	0:48:26	SEM
12				FRA	H	1:04:47	0:16:19	0:32:07	0:48:27	SEM
13				FRA	H	1:05:06	0:16:31	0:32:20	0:48:39	M35
14				FRA	H	1:05:37	0:16:29	0:32:20	0:48:42	SEM
15				FRA	H	1:06:13	0:16:55	0:32:56	0:49:30	M55

Thanks to the 20KM race, we reidentified :

- 3 people (high confidence) that we contacted
- 2 people (lower confidence)

People who can be identified



Re-identification from home and work:

- 1) Identifying where you live
- 2) Identifying the workplace
- 3) Finding matches

**Based on a sample of 20 people (out of 800,000),
6 have probably been re-identified**

People who can be identified

- 9 letters sent
- 2 answers
 - People were not aware that their data was for sale



Contacting people

- Geolocation data is highly identifying
- Access to this data is not too complicated
- It is relatively simple to identify people at random
- **What we should have done : send ads to the reidentified persons**

Country	MAU AVG	DAU AVG	AVG Signal Density per device
United States	276,385,712	68,026,676	260.0
Brazil	77,096,216	16,096,212	148.1
Mexico	66,657,160	16,725,577	46.2
India	54,819,214	13,028,256	299.1
Japan	36,536,525	13,150,931	490.8
Turkey	27,174,718	4,414,224	23.6
Iraq	21,494,992	5,357,465	51.9
Vietnam	21,444,601	5,137,433	193.8
Canada	21,126,526	6,589,478	172.5
Indonesia	20,102,165	2,323,540	83.2
Colombia	15,152,792	2,834,559	17.4
United Kingdom	13,498,333	3,478,600	245.2
France	12,749,017	2,638,370	75.8

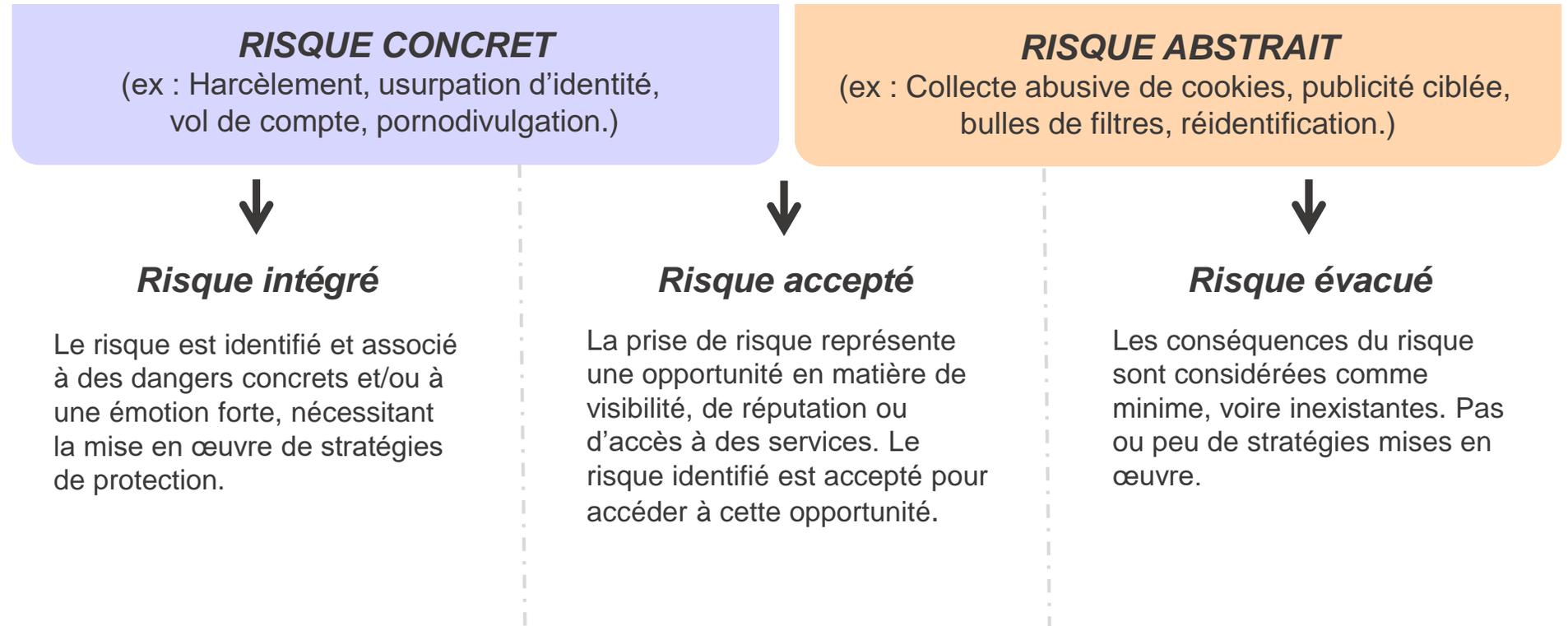
Conclusion

LINC

Digital practices in middle schools



Numerique et adolescent



Numerique et adolescent

LINC
Laboratoire d'Innovation Numérique de la CNIL

DOSSIERS EXPÉRIMENTATIONS PUBLICATIONS À PROPOS DE LINC

Numérique adolescent et vie privée (Épisode 1) :
ce que dit la littérature en sciences sociales

Rédigé par Mehdi Arfaoui (sociologue) et Jennifer Elbaz (mission EducNum) - 09 octobre 2023

Le LINC et le pôle EducNum de la CNIL enquêtent sur l'accompagnement à la protection de la vie privée des collégiens. Ce premier épisode propose un retour sur les travaux en sciences sociales du numérique adolescent.



LINC
Laboratoire d'Innovation Numérique de la CNIL

DOSSIERS EXPÉRIMENTATIONS PUBLICATIONS À PROPOS DE LINC

Numérique adolescent et vie privée (Épisode 2) :
au contact des collégiennes et collégiens

Rédigé par Mehdi Arfaoui (sociologue) et Jennifer Elbaz (mission EducNum) - 15 janvier 2024

Le LINC et le pôle d'éducation au numérique de la CNIL enquêtent sur l'accompagnement à la protection de la vie privée des collégiens. Ce deuxième épisode se propose d'analyser le point de vue des collégiennes et collégiens sur leurs pratiques.



LINC
Laboratoire d'Innovation Numérique de la CNIL

DOSSIERS EXPÉRIMENTATIONS PUBLICATIONS À PROPOS DE LINC

Numérique adolescent et vie privée (Épisode 3) :
enquête statistique auprès des parents

Rédigé par Mehdi Arfaoui (sociologue) et Jennifer Elbaz (mission EducNum) - 31 mai 2024

Le LINC et le pôle d'éducation au numérique de la CNIL enquêtent sur l'accompagnement à la protection de la vie privée des élèves de collège. Ce troisième épisode s'appuie sur un enquête statistique réalisée auprès de 600 parents d'élèves de collège.



Numerique et adolescent

Le concept : équiper les stratégies existantes des adolescents pour protéger leurs données personnelles « sans les adultes », faire de la pédagogie par ce biais

Les principales fonctionnalités :

- Anonymiser une **photo de profil**
- Vérifier/générer des **mots de passe** faciles à retenir
- Générer des **pseudonyme** personnalisés
- Outil d'accompagnement au **droit à l'effacement** (formulaires préremplis, checklist, etc.).
- Notification d'**alerte hameçonnage**

