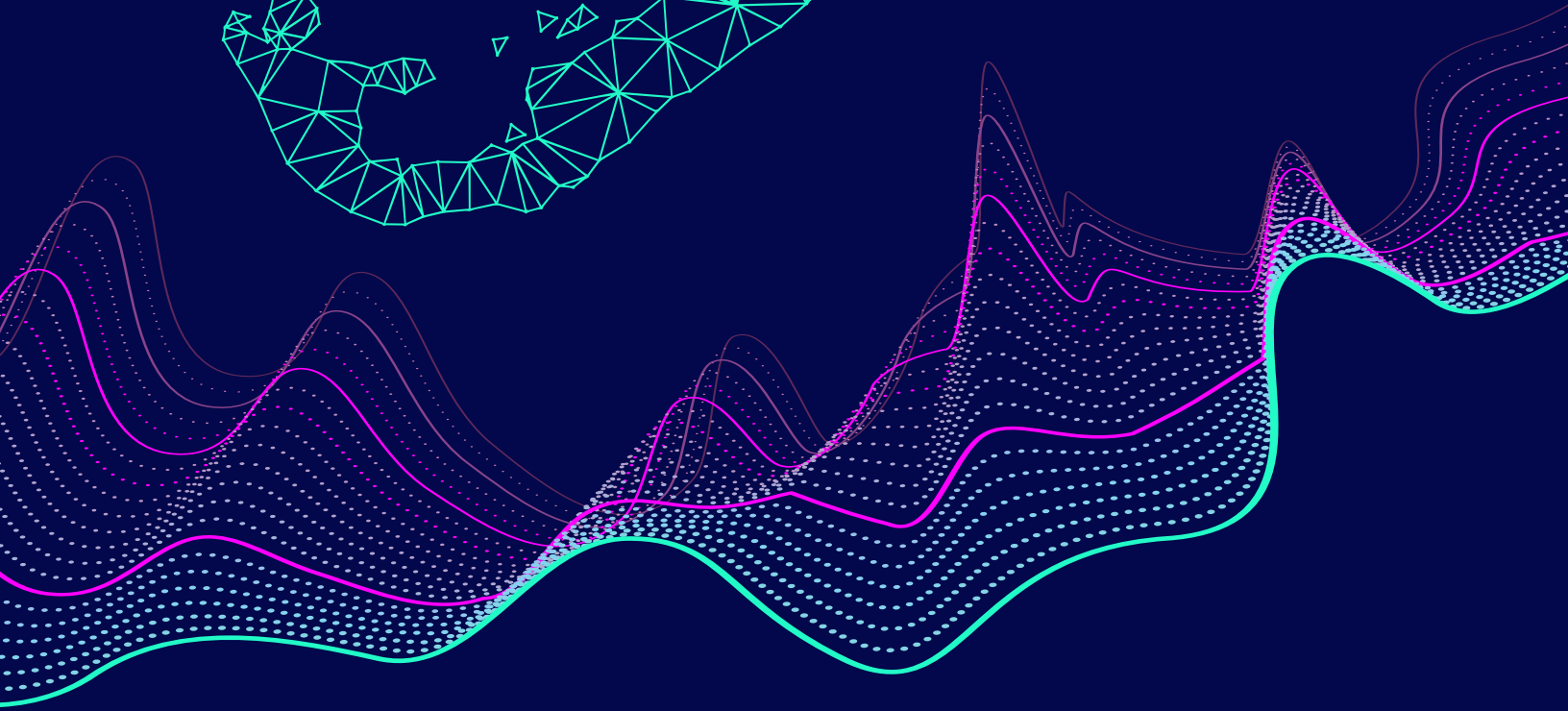
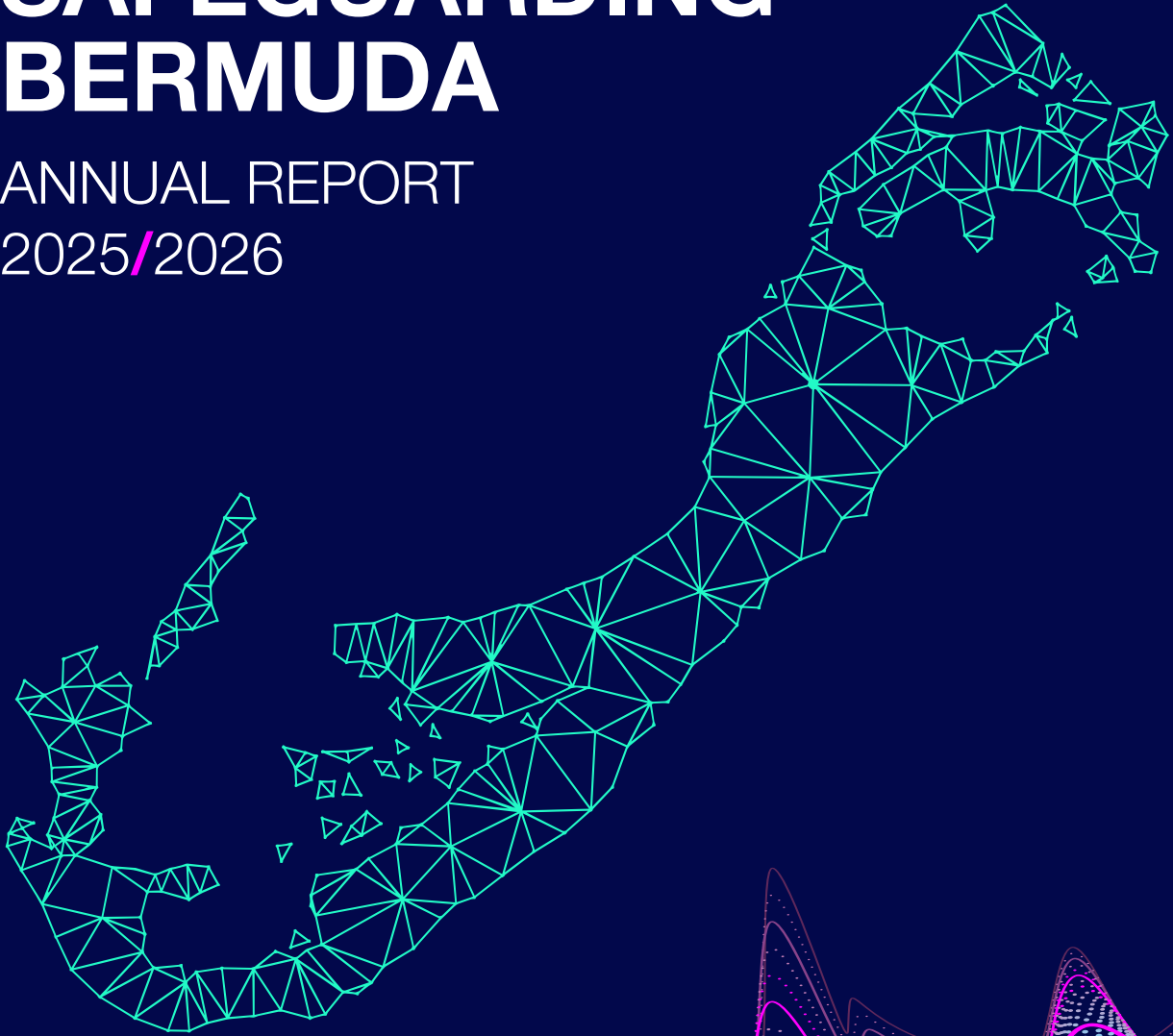


Privacy Commissioner

Bermuda | Quo Data Ferunt

SAFEGUARDING BERMUDA

ANNUAL REPORT
2025/2026



WELCOME ADDRESS

Welcome to the first Annual Report of the Office of the Privacy Commissioner for Bermuda ('PrivCom' or 'the Office'), covering the period from 1 April 2025 to 31 March 2026.

The full enactment of the Personal Information Protection Act 2016 ('PIPA') on 1 January 2025 marked a significant milestone for both Bermuda and PrivCom in its role as the island's independent data protection enforcement authority. Centred on the theme of 'Safeguarding Bermuda', this Annual Report documents the public authority's transition from pre-implementation preparedness activities to more substantive regulatory enforcement.

The reporting period also saw a transition in PrivCom's leadership. Mr. Alexander White, the country's first Privacy Commissioner, was appointed by the former Governor of Bermuda, Mr. John Rankin, effective 20 January 2020, and served the nation in this capacity until 30 September 2025. Following this, the current Governor of Bermuda, Mr. Andrew Murdoch CMG, made a series of acting appointments within PrivCom, including the appointment of the Deputy Privacy Commissioner, Ms. E. Angie Farquharson. Subsequently, the Governor appointed the nation's second Privacy Commissioner, Ms. Gretchen Tucker, effective 2 March 2026. Commissioner Tucker is the first Bermudian and first woman to hold the appointment. A barrister with more than a decade of professional experience in Bermuda, she previously served in business, risk, and legal advisory roles across Bermuda's commercial, public, and third sectors. She also served the jurisdiction as a Co-Chair of the International Association of Privacy Professionals (IAPP) Bermuda KnowledgeNet Chapter for over five years.

The Annual Report identifies the general maturing of PrivCom's strategies for the delivery of its statutory mandate. This maturing has been directly influenced by the substantive provisions of PIPA coming into force in the jurisdiction, inclusive of the statutory rights of individuals to request the Privacy Commissioner to conduct reviews and initiate complaints with the public authority, as well as the Privacy Commissioner's statutory powers pertaining to investigations, inquiries, mediation, and orders.

The Annual Report further outlines the strategic direction for the continued supervision and regulatory enforcement of PIPA by the Privacy Commissioner.

*'Privacy is a journey,
not a destination.'*

ALEXANDER WHITE, FIRST PRIVACY COMMISSIONER FOR BERMUDA
20 January 2020–30 September 2025

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Transmittal:

Transmitted on 22 June 2026 to be laid before each House of the Legislature pursuant to Section 37 of the Personal Information Protection Act 2016 in respect of the reporting period from 1 April 2025 to 31 March 2026



**E. ANGIE
FARQUHARSON**

DEPUTY PRIVACY
COMMISSIONER

I am pleased to present this executive overview on behalf of the Office of the Privacy Commissioner for Bermuda (PrivCom). The overview highlights some of the key work undertaken during this pivotal period in the independent public authority's development as a data protection authority for Bermuda.

Throughout the reporting period, PrivCom engaged in numerous initiatives to foster knowledge and awareness of privacy rights and responsibilities. These initiatives were largely aimed at developing a culture of privacy in Bermuda, where organisations use personal information responsibly and

EXECUTIVE OVERVIEW

individuals understand that the use of their personal information by organisations is subject to lawful requirements.

During this first complete year of enforcement of the Personal Information Protection Act 2016 (PIPA), PrivCom received close to 100 intakes. These intakes took various forms: written requests from individuals; formal breaches of security notifications from organisations; and general inquiries from members of the public. All intakes were facilitated by PrivCom's privacy practitioners familiar with all aspects of the recent introduction of PIPA, PrivCom's existing guidance, and education materials available on the regulator's website.

From a corporate governance and accountability perspective, during the second half of the reporting period, the Office engaged in developing its internal processes by undertaking a strategic planning exercise. The outcome was the identification and definition of PrivCom's foundational values, mission, and vision statements. Guided by the values of integrity, respect, accountability, and innovation, PrivCom is looking to deliver its statutory mandate in a manner that adheres to best international standards while meeting the needs of the local community as the authority matures.

Internationally, PrivCom continues to develop a strong relationship with overseas Data Protection Authorities (DPAs). This is demonstrated by PrivCom's participation as a panellist at the 2025 Global Cross-Border Privacy Rules (CBPR) Workshop, discussing issues of cross-border significance for DPAs which impact the communities they serve. PrivCom also participated at the 38th Privacy Laws & Business conference as a presenter on the panels 'Common Threads that Bind the British, Irish, and Island Data Protection Authorities (BIIDPA)' and 'Data Compliance

in Global Finance Hubs: Best Practices for Financial Services'. Associations with BIIDPA regulators, who are mainly small jurisdictions like Bermuda, assist in informing PrivCom's regulatory priorities and strategic approaches. In turn, this cooperation enhances PrivCom's efforts to promote innovation while protecting the privacy rights of individuals whose personal information is used by organisations in Bermuda. Finally, PrivCom attended the 47th Global Privacy Assembly conference where Bermuda participated in sponsoring and passing two resolutions on AI. These resolutions were aimed at the collection, use, and disclosure of personal information to pre-train, train, and fine-tune AI models while also ensuring meaningful human oversight of decisions involving AI systems prior to being deployed for use. These are a few examples of the international engagements that assist PrivCom in becoming a strong, efficient, and mature regulator.

Locally, PrivCom values its relationships with stakeholders. The Office continues to engage with various public authorities, including the Public Access to Information/Personal Information Protection Act (PATI/PIPA) Unit. The Unit is responsible for Bermuda's public authorities' compliance with both PATI and PIPA. These relationships contribute to the overall development of responsible privacy governance in Bermuda. At the corporate level, these relationships help organisations understand the importance of having in place robust privacy frameworks and programmes, thus strengthening the local data protection infrastructure.

I now invite you to read this Annual Report, which demonstrates the progress made by PrivCom to advance Bermuda's journey in developing a culture of privacy, awareness, and supporting public trust in organisations' use of personal information.



**GRETCHEN
TUCKER**

PRIVACY
COMMISSIONER

MESSAGE FROM THE PRIVACY COMMISSIONER

I am proud to present the first Annual Report submitted by the Privacy Commissioner for Bermuda.

As of the date of the tabling of this report before Parliament, I have served as Bermuda's second Privacy Commissioner for nearly four months. During this period, I have prioritised investing time into onboarding activities with the public officers at the Office of the Privacy Commissioner for Bermuda (PrivCom) and initial relationship development with local regulatory agencies on the island. While this process has resulted in some delays in intake processing and public responses, these organisational and strategic reviews have proven invaluable to the development of my regulatory enforcement strategy.

For much of its six-year existence, PrivCom has necessarily focused on pre-implementation preparedness activities for the Personal Information Protection Act 2016 (PIPA), including international and local stakeholder engagement, participation in international data protection networks, and the development and delivery of local educational initiatives (e.g. presentations, video tutorials, and policy documentation) to prepare organisations and individuals to understand their rights and responsibilities under PIPA. While PrivCom had to focus on these activities for the duration of the delayed enactment of the statutory supervision provisions of the legislation, it also invested considerable time and resources in staff development for its public officers to deliver those limited provisions of the legislation that were in force.

Following the full enactment of PIPA on 1 January 2025, PrivCom expanded its activities to include more substantive supervisory functions. However, the departure of the first Privacy Commissioner, which was made known publicly in June 2025, resulted in a pro-longed period of leadership transition and a formal regulatory enforcement strategy was not finalised or adopted during this time.

As Bermuda's second Privacy Commissioner, one of my immediate priorities is to develop and establish an informed strategic regulatory enforcement strategy, supported by appropriate governance structures, written procedures, and operational safeguards. This framework must facilitate the statutory rights of individuals under PIPA while also providing organisations with greater regulatory certainty and clarity regarding the lawful use of personal information. It must also align with international best practices for data protection authorities (DPAs) while remaining responsive to the unique operational and technological advancements and risks affecting Bermuda.

This strategy starts with ensuring that the Office is appropriately resourced to facilitate, at a minimum, the statutory processes expressly provided for in PIPA. This includes the statutory right of individuals to ask the Commissioner for a review of an organisation's decision,

action, or failure to act, as well as the right of individuals to initiate a complaint for the Commissioner to investigate. It further includes the Commissioner's ability to attempt to resolve the same by negotiation, conciliation, mediation, or otherwise. It also encompasses the Commissioner's ability to conduct inquiries if a matter is not resolved by the above-mentioned alternative dispute resolution process.

Accordingly, at this stage of my term, I am now transitioning from undertaking general onboarding activities to conducting a deliberate review of the organisational structure, resources, processes, and practices of the authority. This review is intended to support and inform my decision-making in connection with strategic change management, as well as a potential restructuring of the organisation and investment into training, secondments, and internal resources for public officers to develop the capacity of PrivCom to deliver all aspects of its statutory mandate responsibly.

In this regard, I recognise that the strength and success of the Office relies on the hard work and expertise of committed and professional public officers in PrivCom. I remain committed to ensuring that the Office has adequate resources and personnel equipped with the appropriate skills and professional experience to deliver both the educational and supervisory functions established under PIPA.

At all times, the keystone of the PIPA regime is PrivCom. It plays a central role within Bermuda's privacy framework through its independent oversight of organisations' compliance with PIPA and its administration of individual statutory rights. Effective regulation requires clear guidance, proportionate supervision, transparent decision-making, and meaningful enforcement activity to support public trust in the use of personal information by organisations in Bermuda. The continued development of data protection and privacy standards in Bermuda will also require sustained cooperation between the public authority, organisations, public bodies, and the wider community.

The people of Bermuda – and our society as a whole – are our nation's greatest assets and deserve a responsive and accountable independent data protection enforcement agency. It is my privilege to serve in this capacity, advancing the protection of individuals' privacy rights at a national level. I am dedicated to delivering the statutory mandate established in the PIPA legislation as the Privacy Commissioner for Bermuda.

I look forward to working with all of the island's communities and the elected Government to advance the maturing of the privacy regime here in Bermuda.

GRETCHEN TUCKER

PRIVACY COMMISSIONER

OFFICE STAFF

 <p><i>Privacy Commissioner</i></p> <hr/> <p>Gretchen Tucker</p>	 <p><i>Investigations Officer</i></p> <hr/> <p>Michael Jones</p>
 <p><i>Deputy Privacy Commissioner</i></p> <hr/> <p>E. Angie Farquharson</p>	 <p><i>Investigations Officer</i></p> <hr/> <p>Yukio Swan</p>
 <p><i>Legal Counsel</i></p> <hr/> <p>Jordan Cutts</p>	 <p><i>Marketing and Engagement Officer</i></p> <hr/> <p>Tiara S. Webb</p>
 <p><i>Assistant Commissioner (Operations)</i></p> <hr/> <p>Georgia Fevriere</p>	 <p><i>Visual Content and Training Officer</i></p> <hr/> <p>Nakia Pearson</p>
 <p><i>Assistant Commissioner (Investigations)</i></p> <hr/> <p>Christopher Moulder</p>	 <p><i>Administrative Officer</i></p> <hr/> <p>Patricia McCarter</p>
 <p><i>Assistant Commissioner (Policy and Innovation)</i></p> <hr/> <p>Dr. Lucie Fremlova</p>	 <p><i>Executive Secretary</i></p> <hr/> <p>Claudelle Richardson</p>

PART ONE: A YEAR IN REVIEW

Privacy is fundamental to maintaining public trust, individual dignity, and participation in a modern democratic society. The protection of personal information and data privacy are central to safeguarding Bermuda, including activity related to protecting individuals, strengthening organisations, and maintaining public trust in the use of personal information across the public, private, and third sectors. In Bermuda, the Personal Information Protection Act 2016 ('PIPA' or 'the Act') establishes the legal framework governing the lawful, fair, transparent, and proportionate use of personal information by organisations and affirms the statutory rights of individuals.

The reporting period marked the first full year that PIPA's substantive provisions were in full effect (starting 1 January 2025), as well as a leadership transition within the Office of the Privacy Commissioner for Bermuda ('PrivCom' or 'the Office'). This included the departure of Bermuda's first Privacy Commissioner, Alexander White, on 30 September 2025, the appointment of the Acting Privacy Commissioner E. Angie Farquharson in October 2025, and the appointment of the new Privacy Commissioner Gretchen Tucker on 2 March 2026.

PrivCom works to ensure that privacy is not only protected in principle but upheld in practice. As an independent public authority, PrivCom is responsible for supervising organisations' compliance with PIPA and administering the statutory rights established under the legislation. During the reporting period, the Office continued to develop its supervisory and operational capabilities through regulatory oversight, investigations, guidance development, public education and awareness initiatives, and engagement with local and international stakeholders.

Key activities undertaken during the reporting period ranged from regulatory oversight to the publication of guidance and other resources to public engagement. With speaking engagements and presentations to the Bermuda Captive Conference, the Association of Bermuda Compliance Officers (ABCO), the World Bank, and the Global Privacy Assembly (GPA), PrivCom staff members were afforded the opportunity to discuss key topics in the privacy landscape, both locally and worldwide. These engagements supported regulatory cooperation and the exchange of developments relating to emerging privacy risks, governance practices, and international data protection standards.

During the reporting period, PrivCom's Investigations Unit facilitated statutory intake and investigations processes at the direction of Commissioner White and subsequently the Acting Privacy Commissioner Farquharson. The Unit received a total of 30 written requests, 25 reported personal information breaches, and 43 general queries. Additionally, the Investigations Unit coordinated the participation of all PrivCom staff in the 2025 Global Privacy Enforcement Network (GPEN) Sweep. A detailed summary of the Investigations Unit's activities is provided later in this report.

A recurring theme across PrivCom's activities throughout the reporting period was age assurance, particularly in relation to safeguarding the personal information of children, young people, and seniors. This focus informed a range of guidance, engagement, and supervisory activities undertaken throughout the year, as documented in this report.

Another significant area of focus was the development and establishment of PrivCom's strategic priorities, which are outlined in this report, to support the continued maturity of its regulatory and operational functions. These priorities were informed by leadership development initiatives undertaken through the Four Disciplines of Execution programme hosted by expert leadership consultant, Mr. Richard James of FranklinCovey. The resulting strategic development process runs parallel to the activities that PrivCom delivers as a regulator and acts as an indicator of the organisation's continued growth.

Finally, the reporting period marked significant progress for collaboration between PrivCom, the Department of National Security, and the Bermuda Police Service regarding the use of CCTV systems in Bermuda and the sharing of personal information captured by CCTV surveillance technologies. In July 2025, former Privacy Commissioner White participated in a public town hall discussion regarding the privacy implications associated with CCTV use in Bermuda. In February 2026, PrivCom issued guidance relating to recording at public events.

Safeguarding Bermuda, from a privacy and data protection standpoint, requires more than legal compliance alone. It requires a culture of responsibility: organisations must act as stewards of the personal information entrusted to them by actively and proactively protecting this personal information, while individuals must be empowered to understand and exercise their statutory rights. Moreover, it requires effective regulatory oversight and enforcement, accountable organisational practices, and informed public awareness to ensure that the rights, obligations, and principles established under PIPA are implemented in practice.

Ultimately, the mandate of the Privacy Commissioner is to monitor the administration of PIPA to ensure that its purposes are achieved and that individuals' statutory privacy rights are upheld. The Privacy Commissioner's mandate involves undertaking reviews, conducting investigations, providing reports, and developing public awareness of Bermuda's statutory privacy framework. The Privacy Commissioner is empowered to regulate the use of personal information by organisations so that such use is done in a manner that recognises both the need to protect the privacy rights of individuals in relation to their personal information and the necessity for organisations to use personal information for legitimate purposes. All activities outlined in this report derive from or serve this mandate.



Former Commissioner White at the CCTV town hall

PrivCom Mission, Vision, and Values

Mission

In the delivery of its statutory mandate, regulatory responsibilities, and the key activities cited above, PrivCom is guided by the following mission statement, which was revised by senior management in August 2025:

‘To regulate the use of personal information in Bermuda by organisations and to protect the rights of individuals in Bermuda in relation to the use of their personal information in accordance with the Personal Information Protection Act 2016 (PIPA).’

Vision

PrivCom’s vision statement reflects the regulator’s long-term regulatory objective and commitment to effective supervision under PIPA:

‘As Bermuda’s privacy regulator, we ensure that international best practices are applied to promote forward thinking and efficient protection of the privacy rights of all individuals whose personal information is used by organisations in Bermuda.’

Values

PrivCom is guided by commitment to the following values in the delivery of its mandate, fulfilment of its responsibilities, and interactions with the public, including individuals, organisations, and other regulators and stakeholders in Bermuda:

-  **integrity**
-  **respect**
-  **accountability**
-  **innovation**

Strategic Plan and Priorities

PIPA received Royal Assent on 27 July 2016; the sections relating to the appointment of the Privacy Commissioner were enacted on 2 December 2016, including the establishment of PrivCom and the conferment of those duties and powers relevant to its operation in the period prior to the enactment of the full Act.

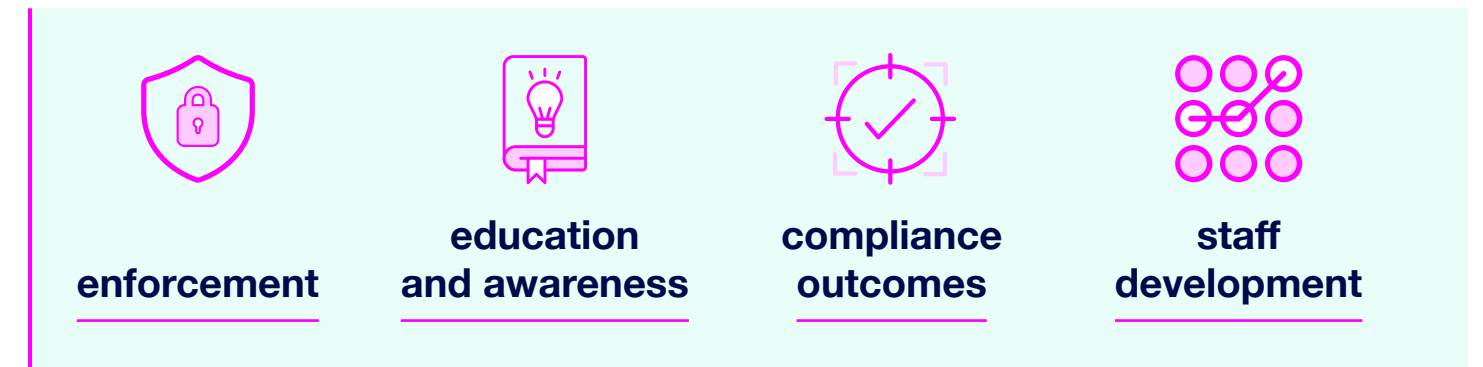
Prior to the full enactment of PIPA’s substantive provisions on 1 January 2025, PrivCom primarily fulfilled its mandate through pre-implementation preparedness activities, including

public awareness initiatives, local and international stakeholder engagement, and organisational capacity-building. Efforts were also directed towards developing operational capabilities and empowering personnel with the privacy knowledge and expertise necessary to supervise compliance with PIPA and administer the regulatory functions established under the legislation.

In June 2025, PrivCom published a Pre-Implementation Report covering the period from January 2020 to December 2024, documenting key milestones

and the ‘Road to PIPA’ campaign. The report also established the foundation for strategic planning activities to be completed in the next fiscal year.

Beginning in July 2025, PrivCom’s senior management team undertook a multi-tiered strategic planning exercise to support the continued development of the public authority’s regulatory, operational, and governance functions. The resulting strategic framework outlined for PrivCom in the 2025–2026 planning process translated into four key priorities to ensure continued growth and development:



Priority One: Enforcement

The effective supervision and enforcement of PIPA is a core strategic priority for PrivCom. This includes all efforts to uphold and advance privacy rights to deliver impactful outcomes for Bermuda’s community, such as strengthening regulatory processes, improving operational efficiency, providing accessible policy guidance and a clear regulatory strategy, and supporting the consistent administration of statutory rights and obligations under PIPA.

Key activities during the reporting period included:

- reviewing the online ‘Guide to PIPA’ to ensure its continued accuracy, accessibility, and effective use as a public resource;
- submitting PrivCom’s 2025 GPEN Sweep results in accordance with the timetable established by the GPEN Sweep coordinators;
- establishing a log to facilitate the quarterly review and publication of case-related statistics; and
- continuing regulatory engagement and relationship development with overseas jurisdictions comparable in size and regulatory complexity to Bermuda.

Priority Two: Education and Awareness

Education and awareness activities remain an important component of supporting compliance with PIPA and improving understanding of statutory rights and obligations among organisations and individuals in Bermuda. These activities encompass industry consultation and stakeholder engagement, the development of guidance materials and training resources, public communications and events, and other strategically aligned media activities. PrivCom actively works to help organisations and individuals understand statutory rights request processes and compliance obligations under PIPA through the publication of accessible and practical written guidance, delivery of educational resources, implementation of public awareness initiatives and engagement programmes, and impact measurement via surveys and other public feedback mechanisms.

Key activities undertaken during the reporting period included:

- completing scripting and video production for approved virtual privacy training models;
- initiating an extended, targeted awareness campaign focused on children's online privacy and digital safety; and
- relaunching the Privacy Innovation and Knowledge-sharing (PINK) Sandbox to support organisations developing emerging technologies or innovative projects involving the use of personal information, including through the application of privacy-by-design principles.

Priority Three: Compliance Outcomes

PrivCom continues to develop its regulatory and operational practices in alignment with recognised international standards for public authorities exercising supervisory and regulatory enforcement functions. This includes strengthening internal governance, operational processes, and communications through risk-based, data-driven, privacy-enhancing, and sustainable approaches to operations and risk management.

Key activities undertaken during the reporting period included:

- publishing the Pre-Implementation Report covering the period from January 2020 to December 2024;
- facilitating the required Government internal audit;
- updating the privacy notice published on the PrivCom website (www.privacy.bm); and
- conducting a review of departmental objectives as part of a wider exercise to support the general maturing of the public authority and to reflect that all sections of PIPA have been fully in force for 15 months.

Priority Four: Staff Development

The continued development of staff capability and organisational resilience remains a priority for PrivCom. Maintaining a skilled and appropriately supported workforce is necessary to ensure the effective administration of the Office's statutory responsibilities. The ultimate goal is to foster a workplace where staff are valued and empowered and have the appropriate skills and experience to meet accountability standards within a complex and evolving regulatory environment. Against this backdrop, the Office continued to support professional development, succession planning, and specialist training opportunities to strengthen operational capability so that staff are adequately supported to uphold public trust in the delivery of its mandate.

Key activities undertaken during the reporting period included:

- finalising the professional development plan for all PrivCom staff;
- establishing a schedule and budget for participation in international conferences and regulatory engagements;
- reviewing and renewing regulatory memberships as required; and
- implementing and maintaining a project management schedule to support operational planning and resource allocation.

The four strategic priorities – enforcement, education and awareness, compliance outcomes, and staff development – informed the activities and achievements of each unit within PrivCom. The following section provides an overview of the work undertaken by each unit during the reporting period.

Performance Reports

The Performance Reports section of the Annual Report 2025–2026 provides an account of PrivCom's work over the course of the reporting period. Each unit report outlines key activities and achievements.



Operations Unit

The Operations Unit is responsible for a range of PrivCom's administrative functions, including finance, human resources, compliance, and communications. Its overall objective is to provide administrative and operational support to PrivCom's internal departments to facilitate the delivery of its statutory mandate: regulating the use of personal information by organisations and protecting the rights of individuals under PIPA.

Financial Audits

During the reporting period, auditors of the Office of the Auditor General completed a five-year financial audit of PrivCom, covering the period 2018–2023. No material concerns were identified during the audit process. In March 2026, planning commenced for a further two-year audit covering the 2024 and 2025 fiscal years. To view PrivCom's audited financial statements, visit the [Financial Statements](#) section of PrivCom's public website.

Public Access to Information (PATI) Requests

PrivCom received no PATI requests during the reporting period.

Information Technology (IT)

In April 2025, PrivCom completed an IT project to establish independent network infrastructure. PrivCom and the Information Commissioner's Office (ICO) are colocated and share office infrastructure. In addition, the migration of telephone services began during April 2026 in preparation for separation from the ICO.

Website

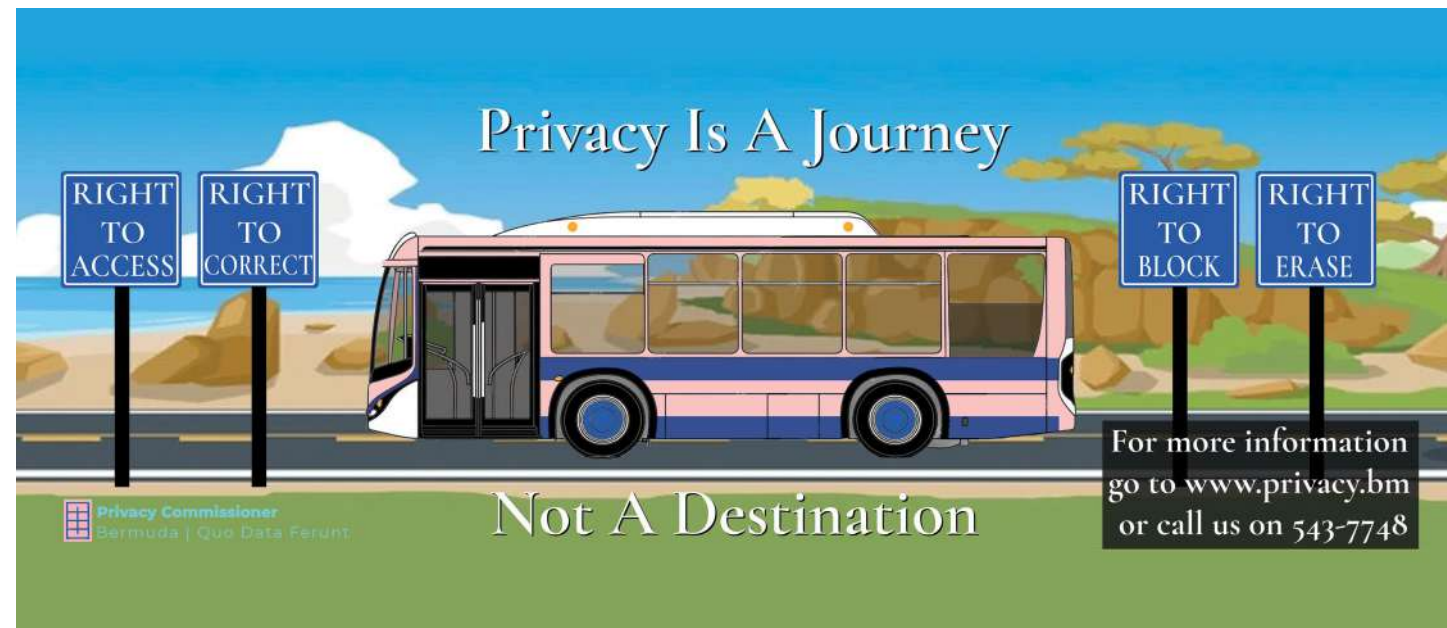
A major third-party review of PrivCom's website was conducted in winter 2025. The review identified several recommended improvements relating to website accessibility. In an evolving landscape of cyber risks, PrivCom will also conduct a backend audit of the website.

Training

Staff development efforts continued to focus on the attainment of industry-recognised professional certifications, including the International Association of Privacy Professionals (IAPP) Certified Information Privacy Manager (CIPM) qualification. Additional training initiatives are detailed in the Office Training section of this report (p. 21).

Public Awareness Campaign

Starting in March 2025, PrivCom's Operations Unit ran a poster campaign on the back window of selected buses. The public awareness campaign on privacy rights under PIPA was operational throughout the island until the end of 2025. Using the slogan 'Privacy is a journey, not a destination,' the display raised the public's awareness of the four rights under PIPA, portraying them as bus stops along the 'privacy journey'.



Campaign poster

Investigations Unit

During the reporting period, the Investigations Unit within PrivCom was responsible for facilitating the statutory processes associated with intakes and investigations at the direction of Commissioner White and, following his resignation from office, at the direction of the Acting Privacy Commissioner appointed by the Governor of Bermuda at any given time. The Unit received a total of 30 written requests for the Privacy Commissioner to review an organisation's decision, action, or failure to act; 25 reported personal information breaches; and 43 general queries. A detailed summary of the work undertaken by the Investigations Unit is provided below.



Case Management Process for Written Requests

During the reporting period, the Investigations Unit adopted a case management process comprising the following three stages:

Intake



All written requests are preliminarily assessed, leading to the classification of the same as either 'invalid' or 'valid'. Invalid requests are closed at this stage, while valid requests are accepted and progressed to the appropriate next stage.

Early Resolution

The Investigations Unit attempts to resolve all valid written requests by commencing open dialogue with organisations. In some cases, this involves seeking clarification and/or requesting specific information to assess compliance with PIPA.



Investigation



If an organisation fails to comply with requests from the Investigations Unit during the early resolution stage or a matter requires direct escalation due to the facts of the case, the Investigations Unit formally commences an investigation. The investigation could include requesting specific information, documents, records, or other materials to determine compliance with PIPA.

Statistical Case Summary

Since the substantive provisions of PIPA came fully into force in Bermuda on 1 January 2025, the Investigations Unit has published quarterly statistics on intakes received by the Unit. These quarterly reports serve to support transparency regarding the regulatory authority's delivery of its mandate to enforce the statutory rights of individuals and regulate the lawful use of personal information by organisations. These reports also contain statistical data and key takeaways to develop public awareness of the various types of intakes received by PrivCom. The summary below highlights the key statistics and takeaways during the reporting period.



30

Written Requests

PrivCom received a total of 30 written requests during the reporting period. Of the total written requests received, eight were requests for the Privacy Commissioner to review an organisation's failure to act. The following information is reported in connection with the same:

- six written requests for a review were resolved informally during the early resolution stage of the case management process and subsequently closed; and
- two written requests for a review were active at the end of the reporting period.

The remaining 22 written requests received were complaints. The following information is reported in connection with the same:

- 16 complaints were resolved informally during the early resolution stage of the case management process and closed; and
- six complaints were active at the end of the reporting period.

25

Personal Information Breaches (Breaches of Security)

PrivCom received a total of 25 reported personal information breaches.¹ Of the 25 reported personal information breaches:

- 21 were reviewed and closed by PrivCom; and
- four were active at the end of the reporting period.

Across the reported personal information breaches:

- ten were related to accidental disclosure of personal information;
- seven were related to the unauthorised use of personal information by an employee of an organisation; and
- eight were related to the unauthorised use of personal information by an external third party contracted or otherwise engaged by an organisation.

43

General Queries

PrivCom received a total of 43 general queries during the reporting period. Of the total general queries received, all 43 were closed informally by providing recommendations or guidance to relevant resources.

Some of the common general queries received included questions relating to:

- organisations facilitating PIPA rights requests made by individuals in connection with the exercise of their privacy rights;
- statutory timeframes applicable to organisations' facilitation of individuals' PIPA rights requests;
- requirements for organisations to make statutory notifications concerning personal information breaches (breaches of security); and
- requirements for organisations to have privacy notices in place prior to or at the time of collecting individuals' personal information.

¹An additional personal information breach was reopened from the previous reporting period and was active at the end of the reporting period.



The image of a fingerprint, lock, password, and key is used in the Annual Report 2025-2026 to illustrate the theme, Safeguarding Bermuda. It is also used in connection with section 13 of PIPA, [Security safeguards | PrivComBermuda](#):

(1) An organisation shall protect personal information that it holds with appropriate safeguards against risk, including—

- (a) loss;
- (b) unauthorised access, destruction, use, modification or disclosure; or
- (c) any other misuse.

(2) Such safeguards shall be proportional to—

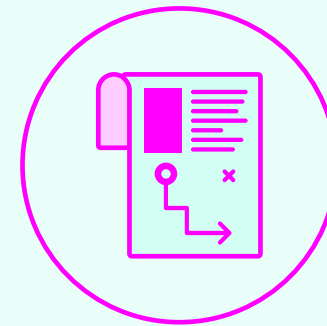
- (a) the likelihood and severity of the harm threatened by the loss, access or misuse of the personal information;
- (b) the sensitivity of the personal information (including in particular whether it is sensitive personal information); and
- (c) the context in which it is held, and shall be subject to periodic review and reassessment.

The image, which depicts biometric information, is also a reference to section 7 of PIPA, [Sensitive personal information | PrivComBermuda](#).



Policy and Innovation Unit

The Policy and Innovation Unit is responsible for the development of PrivCom’s policy interpretations and guidance for individuals and organisations, surveys, and strategic initiatives related to innovation and emerging privacy issues. The Unit’s activities during the period from 1 April 2025 to 31 March 2026 are outlined below.



Guidance

During the reporting period, the Policy and Innovation Unit worked to consolidate multiple education and awareness initiatives undertaken in preparation for the full enactment of PIPA. This included the development of guidance materials for individuals and organisations, as well as on-demand training resources for organisations implementing robust privacy programmes. The Unit also continued to work on topics relevant to PIPA enactment and policy interpretations with guidance materials on topics such as:

- [age assurance and privacy](#);
- [protecting personal information in the medical field](#);
- [working with third parties in non-comparable jurisdictions](#); and
- [recording people at public events \(individuals\)](#).



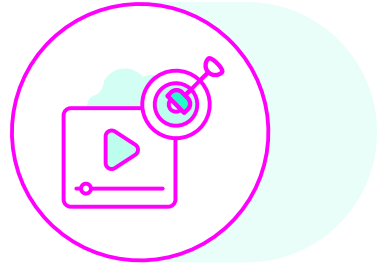
PINK Sandbox

The PINK Sandbox initiative supports organisations developing innovative projects, products, or services involving the use of personal information. The initiative provides participating organisations with access to privacy expertise, tailored regulatory support, opportunities to identify and mitigate privacy risks, and support when implementing privacy-by-design approaches.

The PINK Sandbox also supports mutual learning between PrivCom and participating organisations by improving regulatory understanding of emerging technologies and innovation practices. The projects that form part of the PINK Sandbox increase PrivCom’s understanding as a regulator and may inform the guidance that PrivCom develops and publishes.

Following a public call for expressions of interest in the PINK Sandbox, the Unit engaged with a number of selected organisations utilising emerging technologies or exceptional innovations in their use of personal information. The engagements followed five key stages: initiation, planning, implementation, communication and engagement, and exit and evaluation.²

² At the time of the publication of this Annual Report, a final report was being drafted.



PINK Sandbox Media Strategy

The call for expressions of interest in the 2025 PINK Sandbox was published on 10 April 2025, with a deadline for submissions on 11 May 2025.

The initiative was promoted on PrivCom's website, social media platforms (LinkedIn, Facebook, Instagram), in-person at IAPP Bermuda Chapter's KnowledgeNet meeting, and through a series of reminder posts published at weekly intervals online during the application period. On 14 April 2025, PrivCom also published a five-minute PINK Sandbox video explainer across its social media platforms. On 1 May 2025, the PINK Sandbox was presented at the ISACA (formerly known as the Information Systems Audit and Control Association) Annual General Meeting. Finally, on 6 May 2025, PrivCom and the Government of Bermuda Economic Development Department (EDD) held a joint webinar on the 2025 PINK Sandbox initiative.

Media coverage included:

- On 13 April 2025, a press release was published by *Bernews* ('[PrivCom Launches 2025 PINK Sandbox Initiative](#)') and the next day by *The Royal Gazette* ('[Tech companies to discuss privacy pitfalls](#)').
- An interview for the BBC aired as the lead story for the evening news on 15 April 2025; this was then published as a news story on 16 April 2025 ('[Privacy Commissioner launches PINK Sandbox](#)').
- Another piece about the initiative was published by *The Royal Gazette* on 16 April 2025 ('[Carey Olsen and Selectron in PIPA's PINK Sandbox](#)').
- The press release was published on PrivCom's website on 22 April 2025 ('[PrivCom is launching the 2025 iteration of the PINK Sandbox](#)').
- The EDD published a press release promoting the joint webinar through the Government of Bermuda website on 1 May 2025 ('[EDD and PrivCom to Host Webinar on the 2025 PINK Sandbox: Championing Responsible Innovation](#)').
- *The Royal Gazette* published the announcement about the EDD webinar on 1 May 2025 ('[Webinar Offered on Relunched 2025 PINK Sandbox](#)'), as did *Bernews* ('[PINK Sandbox Webinar To Be Held On May 6th](#)').



Public Engagements

Key engagements undertaken by the Policy and Innovation Unit during the reporting period included the following:

- EDD and PrivCom joint webinar on '[Building Bold Ideas. Safely. The 2025 PINK Sandbox](#)', 6 May 2025;
- World Bank Caribbean Workshop on 'Data Protection for Policymakers', Barbados, 22 May 2025;
- Bermuda Captive Conference on 'Resilience through Regulation', 10 June 2025;
- Privacy Laws & Business (PL&B) 38th International Conference, Cambridge, UK, July 2025
- ABCO Conference on 'Regulatory Ripple – Bermuda's Next Compliance Wave', 17 September 2025;
- The Datasphere Initiative webinar on 'Sandboxing Foundations – Tools for Data Governance', 27 October 2025; and
- Keynote address for ABCO, 29 January 2026.

Further details regarding these engagements are provided in Part Two: Public Engagement (pp. 27–35).



Office Training

As part of PrivCom's strategic priority four focusing on staff development (see above, p. 12), the Office continued to support professional development, technical training, and organisational capacity-building during the reporting period through the following training opportunities.

Secondment to Office of the Data Protection Authority (ODPA) Guernsey

As part of ongoing efforts to strengthen institutional knowledge through engagement with comparable jurisdictions, PrivCom's Visual Content and Training Officer, Nakia Pearson, undertook a secondment to ODPA Guernsey during spring 2025.

During the secondment, he participated in a range of public awareness initiatives, including the delivery of educational sessions on privacy rights to Sark Island schoolchildren. Upon his return, he produced a series of public awareness materials related to cybersecurity for children.



From left to right: Nakia Pearson (PrivCom), Brent Homan (ODPA Data Protection Commissioner), and Rachel Masterson (ODPA Deputy Commissioner). © ODPA

Leadership Development Training

From 26–28 August 2025, the senior management team attended the Four Disciplines of Execution course offered through FranklinCovey Bermuda. The training provided a framework for turning strategy into results by focusing on the most important goals, leveraging lead measures, maintaining visibility through scoreboards, and fostering a culture of accountability. This methodology was used to create PrivCom's 2026–2029 Strategic Plan. For more information, see pp. 11–12.



From left to right: Nakia Pearson, E. Angie Farquharson, Jordan Cutts, Christopher Moulder, Brendalee White, Georgia Fevriere, Dr. Lucie Fremlova, and Claudelle Richardson

SCARS Training

On 20 October 2025, PrivCom staff undertook a virtual training session with SCARS Bermuda, a charity promoting awareness of the impact of child sexual abuse. The session provided staff with a broad range of information on community responsibility for protecting children. As a result of the training, 80% of PrivCom staff members are now SCARS-certified. PrivCom staff received SCARS training to support work on protecting the personal information of children and young people under the age of 14.

Leadership Development Conference

During the week of 4–7 November 2025, the management team attended the FranklinCovey Online Impact Conference focused on leadership development. The conference explored concepts such as clarity, trust, and courage as foundations for effective leadership and emphasised a 'trust and inspire' style of leadership to cultivate high-trust organisational cultures and inspire innovation.

Other Training Opportunities

The following training activities supported the operational and organisational functions of PrivCom, covering human resources, staff well-being, and workplace health and safety.

- **Employee Assistance Programme (EAP):** On 12 August 2025, ten members of PrivCom staff participated in a training session on mental health in the workplace.
- **Adult first aid and CPR:** On 12 March 2026, five members of PrivCom staff received CPR training compliant with American Heart Association and American Red Cross standards.
- **Fire marshal and fire extinguisher practices:** On 27 March 2026, two members of PrivCom staff received fire marshal and fire extinguisher practices training from Fire and Safety Associates, Bermuda.
- **Performance appraisal:** On 26 March 2026, 90% of PrivCom staff received performance appraisal training from the Government of Bermuda Department of Employee Organisational Development (DEOD). The training included topics relevant to both reporting officers and senior management, including setting performance objectives for all staff, preparing for performance appraisals for managers, and conducting performance management conversations.



Autumn 2025 Internship

On 1 September 2025, PrivCom started a 12-week internship programme for a university student to gain valuable experience in the data privacy regulatory sector. Working in collaboration with PrivCom's Legal Counsel Jordan Cutts, the intern performed a two-part regulatory gap analysis.

The first part of the gap analysis assessed PIPA and PrivCom's enforcement activities compared to the legislative frameworks and regulatory enforcement activities observed in comparable foreign jurisdictions, specifically the British Virgin Islands, United States Virgin Islands, and Cayman Islands. The gap analysis afforded the intern the opportunity to identify commercially advantageous strengths and weaknesses of the data privacy legislative framework under PIPA when compared against the data privacy legislative frameworks in comparable foreign jurisdictions in the Caribbean that also feature a prominent international financial service sector.

The second part of the gap analysis consisted of a similar comparative assessment of federal- and state-level data privacy legislation in the United States. The internship was designed to support the development of legal research, critical thinking, and writing skills while expanding the intern's practical understanding of data privacy principles. Overall, the exercise identified how PIPA might be supplemented to ensure that Bermuda remains a first-choice jurisdiction for international financial institutions.



Summer 2025 Internship

In summer 2025, PrivCom hosted a Cedar Bridge Academy student as part of an eight-week internship at Skillcraft, Bermuda on young people's privacy and digital rights.

Working alongside PrivCom's Marketing and Engagement Officer Tiara S. Webb, the intern conducted a social media audit and designed social media graphics aligned with PrivCom's public awareness objectives around age assurance. They also produced a youth-focused video on privacy and digital rights, demonstrating both technical skills and the ability to translate complex concepts into accessible, relatable content for their peers.

The intern identified that children and seniors tend to be particularly vulnerable populations when it comes to privacy – as children tend not to understand privacy-related risks online and seniors are often targeted by scammers – and highlighted the importance of both groups gaining a better understanding of their rights through public information campaigns.

Lessons Learned in Year One

During the reporting period, PrivCom identified five key themes from the analysis of its activities and public feedback received during the first year of the full enactment of PIPA. The themes broadly align with PrivCom's strategic priorities discussed in the Strategic Plan and Priorities section (see pp. 11–12).

Cultural Change

Bermuda's privacy landscape has been undergoing a major transition following the full enactment of PIPA on 1 January 2025. PIPA introduced a comprehensive statutory privacy framework regulating the use of personal information by organisations that use personal information in Bermuda. During the reporting period, PrivCom observed varying levels of maturity in relation to privacy governance and information-handling practices across sectors.

PrivCom identified that organisations adopting a privacy-by-design approach were better positioned to drive cultural change through the integration of privacy obligations into operational decision-making and governance structures. This could include incorporating key elements of the privacy-by-design methodology into organisational privacy programmes, increasing staff training, and introducing supplemental policies and procedures to reinforce staff compliance with PIPA.

Enforcement and Transitional Aspects of PIPA

Throughout the reporting period, PrivCom received a wide range of requests and general queries related to uses of personal information by organisations and the administration of statutory rights under PIPA. PrivCom informed organisations of their requirement, among other obligations, to maintain and provide privacy notices explaining their practices and policies relating to the use of personal information. Organisations must account for how they use personal information and whether they are using any additional personal information beyond the information first collected and used. Privacy notices and privacy policies must be updated periodically as the use of personal information changes, including accounting for the addition of new third-party arrangements for the sharing of personal information. These obligations require ongoing review and consideration for updating privacy programmes and associated policies and procedures beyond an annual update.

PrivCom identified that individuals started to exercise their rights relating to the use of personal information. These rights include the right to access, correct, block, erase, and destroy their personal information. The Office assisted individuals by providing guidance and support. In the exercise of their privacy rights, some individuals reviewed an organisation's privacy notices to understand how their personal information was being used. Also, they were able to contact the organisation in question to request withdrawal of their consent, or to otherwise exercise their statutory rights, through a PIPA rights request. If an individual's consent has not been withdrawn, then the organisation likely could continue to rely on deemed consent as a lawful condition for the use of the individual's personal information, subject to compliance with the applicable provisions of PIPA.

PrivCom identified requests where individuals sought to pursue rights under PIPA while simultaneously engaging in separate grievance procedures, legal proceedings, or regulatory processes. In these cases, PrivCom reiterated that PIPA is not

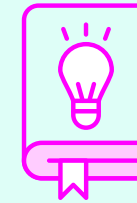
intended to circumvent, supplement, or duplicate existing grievance, legal proceedings, complaint, or review procedures or mechanisms. It is important for individuals to consider the best procedure for attempting to resolve their specific matter. Under Section 38(3) of PIPA, the Privacy Commissioner has the authority to require individuals to exhaust alternative procedures where appropriate before proceeding with a complaint under PIPA.

As a general practice, the Commissioner will require an individual to first exercise their privacy rights directly with the relevant organisation through a PIPA rights request before submitting a complaint to PrivCom. For more details regarding the steps individuals must take to exercise their privacy rights under PIPA, see the Seniors Privacy Fact Sheet on pp. 48-49. While other grievances or legal proceedings may take precedence over bringing a specific matter to PrivCom, the Office recognised that an individual's privacy rights under Sections 17, 18, and 19 of PIPA should not be prejudiced solely because separate proceedings are ongoing where those actions relate to different matters.



Education and Awareness

PIPA supports Bermuda's reputation as a premier offshore jurisdiction with robust regulatory regimes aligned with international standards relating to the protection of personal information while still encouraging innovation, engagement, and investment in commerce.



PrivCom published guidance, tools, and awareness materials designed to help organisations and individuals understand and meet their obligations and rights under PIPA.

Resources available through PrivCom's public website include:

- practical tools and guidance materials for businesses, especially small to medium-sized organisations;
- PIPA/General Data Protection Regulation (GDPR) crosswalk identifying areas of alignments and distinction between the two frameworks;
- accessible resources such as the 'Guide to PIPA', 'Individuals' Guide to PIPA', and 'Road to PIPA' templates and checklists; and
- guidance relating to recording individuals at public events and other resources for related privacy considerations.

Internationally, PrivCom also developed education and awareness by continuing to:

- engage with global data protection peers and regulatory stakeholders;
- ensure Bermuda's policies align with international best practices;
- contribute to discussions relating to international privacy standards and emerging issues; and
- support Bermuda's position within international regulatory networks and discussions.

In March 2025, PrivCom published its Financial Service Providers Guidance Notes examining the relationship between PIPA obligations and regulatory frameworks. With the full enactment of PIPA, PrivCom identified areas of potential domestic regulatory coordination, as well as overlap, inconsistencies, conflicts, or lack of clarity between obligations under PIPA and the regulatory framework enforced by the Bermuda Monetary Authority (BMA) and the National Anti-Money Laundering Committee (NAMLC). The Guidance Notes made the following conclusions:

- No material issues were identified regarding the application of PIPA, particularly with respect to the commercial and administrative activities of organisations operating within Bermuda's financial services sector.
- Existing provisions within PIPA adequately address potential challenges and operational issues relating to the use and sharing of personal information.

In May 2025, PrivCom published the first in a series of on-demand training modules, titled 'Who Will Be Your Privacy Team?', throughout its YouTube channel. The training addressed key stages in establishing an organisational privacy framework, including:

- executive approval;
- designation of a privacy officer;
- development of a privacy programme;
- identification of business units and operational processes;
- identification of privacy committee members; and
- review of PIPA requirements to determine how PIPA affects each business unit or process.

PrivCom also engaged in ongoing work related to age assurance mechanisms and technologies. The Office remains aware of the importance of broadening the scope of its communications to ensure that age assurance remains at the forefront of safeguarding vulnerable populations. In January 2026, following a sustained focus on children's privacy in Q3 and Q4 of 2025, PrivCom refocused its attention on Bermuda's vulnerable population: senior citizens. This was the highlight of Data Privacy Day 2026.

Organisational Accountability

PrivCom observed that a significant number of reported personal information breaches related to unauthorised access to or disclosure of personal information by employees within the workplace. The Office continued to emphasise that organisations should ensure employees are aware of their obligations under PIPA, the potential employment-related consequences associated with unauthorised access to or disclosure of personal information, and the organisation's ongoing obligation to use personal information in compliance with PIPA. PrivCom recommends that organisations periodically provide staff with ongoing training relating to privacy principles, internal procedures, and statutory obligations under PIPA to reduce occurrences of internal breaches.

PrivCom received communications from privacy officers highlighting the challenge of managing requests while also balancing competing obligations, duties, and responsibilities. PrivCom recognised the operational pressures and challenges stemming from organisations' competing duties, responsibilities, and resource limitations. The Office emphasised that organisations are expected to adopt suitable governance measures and policies and allocate sufficient resources to allow privacy officers to fully function within the role, effectively manage requests, and support compliance, in accordance with Section 5 of PIPA.

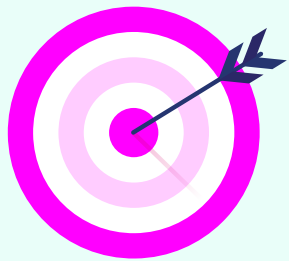
Further engagements with privacy officers across multiple organisations revealed a general lack of understanding about their responsibilities and obligations under PIPA. This highlighted a broader need for additional training and organisational support relating to the administration of individuals' PIPA rights requests, appropriate communication with PrivCom, and the practical implementation of organisational privacy obligations under PIPA. These findings reinforce the need for continued awareness initiatives, organisational development and implementation of a general data protection and privacy infrastructure, and compliance support across sectors to ensure privacy officers are adequately equipped to fulfil their duties.



PART TWO: PUBLIC ENGAGEMENT

Conferences and Events

Between 1 April 2025 and 31 March 2026, PrivCom continued to prioritise engagement opportunities with stakeholders across Bermuda and internationally. Public engagement activities included participation in conferences and industry events, delivery of training and presentations, publication of educational resources, stakeholder consultations, impact surveys, and direct community engagement initiatives with the people of Bermuda. Continued efforts to provide a high level of stakeholder interaction support PrivCom's wider objective of safeguarding Bermuda by providing valuable insight into global best practices and perception of the privacy landscape in our own backyard.



Empowering Individuals

PIPA establishes statutory rights enabling individuals to understand and exercise greater control over how their personal information is used by organisations in Bermuda, offering protection for themselves while strengthening Bermuda's position as a trusted and modern digital jurisdiction. PrivCom received multiple requests for general guidance relating to individual rights under PIPA. The Office responded by providing advice to individuals and raising awareness through public engagements and community events, including the Children's Reading Festival and Seniors Tea Party. For more information, see Part Two: Public Engagements (pp. 27–35) and the Special Reports section of the Appendix (pp. 48–50).

Over the course of the reporting period, PrivCom continued to advance public awareness and understanding of PIPA through targeted guidance, public education and awareness initiatives, and international collaboration.

Throughout the fiscal year, PrivCom released a series of guidance publications and other materials addressing key privacy considerations for individuals and organisations navigating increasingly digitalised environments. Publications explored emerging issues such as age assurance technologies and the responsible use of recording technologies in public spaces. PrivCom also maintained transparency and accountability through the publication of operational updates and quarterly statistical reporting.

A key theme during the reporting period was safeguarding vulnerable populations through improved privacy awareness and public education initiatives relating to age assurance and online safety. As part of these efforts, PrivCom participated in several school events and donated copies of *Warro Goes on an Adventure*, a child-friendly storybook published by ODPG Guernsey, to the Bermuda Human Rights Commission and the Florenz Webbe Maxwell Youth Library (formerly

the Bermuda Youth Library). These efforts aimed to ensure children and families in Bermuda have continued access to child-friendly resources that support privacy literacy and introduce children to the importance of protecting personal information.

In addition, on 28 January 2026, PrivCom hosted the Seniors Tea Party on the occasion of Data Privacy Day 2026. Themed 'Safeguard Your Privacy', the event focused on supporting members of Bermuda's ageing population with awareness and resources to protect their personal information. Promotions for the event were aided by Age Concern Bermuda, a charity dedicated to advocacy for the needs of the ageing population in the local community. Attendance was at maximum capacity. Through informative presentations and one-on-one discussions with PrivCom staff, seniors had the opportunity to learn about PIPA, Bermuda's privacy landscape, and ways in which they can protect their personal information.



From left to right: Yukio Swan, Tiara Webb, Michael Jones, Angie Farquharson, Kieron Hall, and Dr. Lucie Fremlova

International Engagements



Throughout the reporting period, PrivCom staff engaged with regulatory authorities, policymakers, industry stakeholders, and privacy professionals, both at a local level and on the international stage. Participation in these initiatives, which are detailed below, played a critical role in advancing PrivCom's strategic development and maturity as an independent regulatory body.

World Bank Caribbean Regional Workshop on Data Protection for Policymakers, Barbados, May 2025

Dr. Lucie Fremlova, Assistant Commissioner (Policy and Innovation), delivered a presentation on PrivCom, PIPA, and the PINK Sandbox. Regulator and government representatives, privacy experts, and digital policy leaders from across the Caribbean engaged in peer-to-peer learning and knowledge-sharing with respect to adopting privacy laws and establishing DPAs. The workshop provided a platform to explore the role of data protection in fostering public trust, enabling secure digital services, strengthening institutional resilience, and developing a shared vision for technical assistance, capacity-building, and regulatory harmonisation in the Caribbean.

Global Cross-Border Privacy Rules (CBPR) Workshop, Singapore, May 2025

The Global CBPR Forum was held in Singapore on 26–27 May 2025, hosted by the Infocomm Media Development Authority (IMDA). Since Bermuda is an Associate Member of the CBPR, former Privacy Commissioner White represented Bermuda as part of a panel titled 'Global Regulatory Backstops: Strengthening Cooperation Across Borders'. The Global CBPR and Privacy Recognition for Processors (PRP) systems went live on 2 June 2025, providing a scalable, interoperable framework for cross-border transfers of personal information. The key themes that emerged from the workshop included the following:

- Organisations already certified under the Asia-Pacific Economic Cooperation (APEC) CBPR or PRP systems will be automatically grandfathered into the new Global CBPR system to ensure a smooth transition.
- Founded by former APEC members (including Singapore, Japan, Korea, and the United States), the Global CBPR Forum saw strong interest from new jurisdictions, with Bermuda acting as an Associate Member and Nigeria and Thailand declaring intent to join in 2025.
- The Forum highlighted the role of Global CBPR in facilitating AI technology and innovation, which requires robust cross-border flows of personal information.
- The IMDA announced initiatives to support small and medium-sized enterprises with certification costs to increase accessibility.

British, Ireland and Islands Data Protection Authorities (BIIDPA) Annual Meeting, Guernsey, June 2025

Hosted by ODPa Guernsey on 25 and 26 June 2025, the 2025 BIIDPA meeting included constructive discussion around children’s privacy rights, international cooperation, technological innovation and support for financial centres, and modern enforcement methods. The country report for Bermuda was presented by the Visual Content and Training Officer, highlighting full enactment of the PIPA legislation and the ‘Road to PIPA’ materials developed for Bermuda, as well as initial statistics regarding enforcement. The report also included work related to the guidance written for the financial services industry, relaunch of the PINK Sandbox initiative, internal restructuring at PrivCom, and efforts to raise awareness of issues affecting children’s privacy. The report also acknowledged assistance received from the Gibraltar Regulatory Authority through the sharing of educational materials.



2025 BIIDPA Annual Meeting in Guernsey. © ODPa

47th GPA, Seoul, South Korea, September 2025

The 47th GPA conference took place in Seoul, South Korea, from 15–19 September 2025. It was hosted by Korea’s Personal Information Protection Commission (PIPC) at the Grand Hyatt Seoul. The conference brought together 1,200 participants from 65 countries, including representatives from 70 DPAs, international organisations, industry, academia, and civil society.

The outgoing Privacy Commissioner, Deputy Privacy Commissioner, and Assistant Commissioner (Operations) attended the event on behalf of PrivCom. During the conference, PrivCom co-sponsored two resolutions that were tabled at the GPA conference and was honoured to be shortlisted for an award in the category of education and awareness for its 2024 ‘Road to PIPA’ programme, a 37-week strategy of pre-implementation preparedness activities designed to help organisations of every size prepare for the full enactment of PIPA by ensuring privacy is embedded into their structures, operations, and culture. Further information regarding the conference is included in the Special Reports section of the Appendix (pp. 46–47).



From left to right: Georgia Fevriere, Alexander White, E. Angie Farquharson

Privacy Laws & Business (PL&B) 38th International Conference, Cambridge, UK, July 2025

Founded in 1987, PL&B is a well-established and trusted international source of data protection news, information, and analysis worldwide. From 7–9 July 2025, PL&B held its 38th international conference. The Deputy Privacy Commissioner gave a presentation on privacy and financial services in Bermuda as part of a panel titled ‘Data Compliance in Global Finance Hubs: Best Practices for Financial Services’, which included representatives from other data protection and privacy regulators in the BIIDPA region, including Jersey, Gibraltar, and Guernsey. Dr. Lucie Fremlova, Assistant Commissioner (Policy and Innovation) also took part in another panel titled ‘A Common Thread Binds the British, Irish, and Islands’ DPAs Together for Predictability and Legal Certainty’, which also included data protection, privacy, and information commissioners from two other BIIDPA countries: the Isle of Man and Malta. The Assistant Commissioner delivered a presentation on key commonalities across BIIDPA jurisdictions, which explored shared understandings of and laws on privacy, including common law, as well as other cross-cutting themes, including children’s privacy, age assurance, and regulation of privacy within financial services.



E. Angie Farquharson presenting on the financial services panel

The Datasphere Initiative, ‘Sandboxing Foundations: Tools for Data Governance’ Webinar, October 2025

The Assistant Commissioner (Policy and Innovation) participated in an online webinar on 27 October 2025, delivering a presentation on PrivCom’s PINK Sandbox initiative to a global audience of approximately 80 representatives of privacy regulators and other privacy professionals. Presenters were asked a series of questions pertaining to the specific sandbox experiences of their respective jurisdictions. This approach allowed PrivCom to highlight Section 29 of PIPA, which provides the Privacy Commissioner with the power to ‘comment on the implications for protection of personal information in relation to an organisation’s existing or proposed programmes’ (Section 29(1)(f)) and to ‘give guidance and recommendations of general application to an organisation on matters relating to its rights or obligations’ (Section 29(1)(i)).

³The CMA promotes competition for the benefit of consumers enforcing competition and consumer laws within the UK market. The FCA is responsible for regulating the financial services in the UK. Ofcom is a UK regulator that promotes the interest of consumers and citizens in relation to communication services. The ICO is the independent regulatory body in the UK responsible for enforcing privacy and data protection laws and regulations and overseeing the Freedom of Information Act.

Business Meetings, London, UK, February 2026

In February 2026, the Deputy Privacy Commissioner and Legal Counsel attended business meetings with representatives of the Government of Bermuda PATI & PIPA Unit in London. These meetings were hosted by Hogan Lovell International LLP London, a global law firm which has played a major role in the development and drafting of PIPA. PrivCom’s team had a discussion with Sam Roberts, Head of Data Bridge Assessments International Data Flows at the Department of Science, Innovation, and Technology. Mr. Roberts gave an overview of the approach that Bermuda would need to take in order to receive an adequacy designation from the UK. This would be beneficial to organisations in the UK wishing to transfer personal information to Bermuda since the UK would recognise Bermuda as having a level of data protection that is ‘not materially lower’ than provided for by UK law.

In addition, PrivCom’s team received a presentation by Nathalie Lowe from the UK Digital Regulation Cooperation Forum (DRCF). The DRCF is a cross regulatory cooperation consisting of four UK regulators: the Competition and Market Authority (CMA), the Financial Conduct Authority (FCA), the Information Commissioner’s Office (ICO), and Ofcom.³ The four bodies work together to harmonise their respective mandates and to protect and empower UK individuals online while supporting regulatory effectiveness. All the presentations will assist in the future of PrivCom as it grows into a mature regulator, and considers the relationship with other local regulators.

Local Engagements



Department of Economic Development (EDD), 'Bermuda Government: Building Bold Ideas, Safely: The 2025 PINK Sandbox' Webinar, May 2025

On 6 May 2025, the EDD, in collaboration with PrivCom, hosted a public webinar introducing the 2025 PINK Sandbox initiative. This virtual information session on responsible governance was aimed at organisations and innovators across Bermuda working with emerging technologies or delivering exceptional innovation around the use of personal information. It offered a chance to engage directly with PrivCom, learn more about the initiative, and explore how the PINK Sandbox can support safe, impactful innovation while protecting personal information.

Bermuda's Minister of Economy and Labour, the Honourable Jason Hayward, JP, MP, stated:

'Bermuda has long championed innovation rooted in integrity and sound governance. The PINK Sandbox is another step forward in creating a responsible innovation ecosystem. We're proud to support this initiative and encourage stakeholders to participate and take advantage of this opportunity to shape the future responsibly.'

Bermuda Captive Conference, 'Bermuda Shorts: Resilience Through Regulation', June 2025

As part of a conference series titled 'Bermuda Shorts', the Assistant Commissioner (Policy and Innovation) represented PrivCom by delivering a presentation titled 'Resilience Through Regulation' at the 2025 Bermuda Captive Conference. The presentation provided an overview of PIPA with reference to the Financial Services Industry Guidance Notes issued by PrivCom in March 2025. Highlighting the compatibility and connection of Bermuda's privacy legislation with other jurisdictions, the Assistant Commissioner discussed 12 key privacy principles and rules under PIPA which are based on internationally recognised fair information practices and incorporated into international privacy principles, including GDPR and the Organisation for Economic Co-operation and Development (OECD) Privacy Principles.

Bermuda Government and Department of National Security, CCTV Town Hall Meeting, July 2025

On 3 July 2025, the Ministry of National Security hosted a public town hall to provide an update on Bermuda's upgraded, island-wide CCTV network. Minister of National Security Michael Weeks, Commissioner of Police Darrin Simons, and former Privacy Commissioner White shared key insights on the system's capabilities, privacy implications and safeguards, and its role in supporting public safety. With over 225 cameras across 130 locations, the network is designed to enhance security and foster community partnership in tackling crime on the island. During the town hall, the Commissioner of Police confirmed that the CCTV system was designed to respect privacy, with CCTV cameras being focused on public spaces and roadways. The vendor selected to provide the necessary CCTV equipment is required to build privacy safeguards into the hardware and software.

ABCO Conference, 'Regulatory Ripple: Bermuda's Next Compliance Wave', September 2025

On 17 September 2025, the Assistant Commissioner (Policy and Innovation) delivered a presentation on PIPA and privacy as part of the panel 'Regulatory Ripple: Bermuda's Next Compliance Wave' at the ABCO conference held at the Bermuda Underwater Exploration Institute. PrivCom expressed its viewpoint that it is prudent to identify areas of potential domestic regulatory coordination, as well as overlap, inconsistencies, conflicts, or lack of clarity between obligations under PIPA and the regulatory framework enforced by the BMA and NAMLC. The presentation highlighted activities delivered since the full enactment of PIPA on 1 January 2025, including a brief overview of types of issues brought to PrivCom in Q1 and Q2, key findings of the 2024 GPEN Sweep Results, and the Guidance Notes published in March 2025 for financial services providers in Bermuda.

The Bermuda Alumnae Chapter of the Delta Sigma Theta Sorority Incorporated 26th Children's Reading Festival, 'The Next Chapter', November 2025

On 22 November 2025, PrivCom participated in the annual Children's Reading Festival hosted by the Bermuda Alumnae Chapter of the Delta Sigma Theta Sorority Incorporated at Victoria Park. PrivCom staff engaged directly with parents, guardians, and educators at a dedicated information booth.

The initiative formed part of PrivCom's broader commitment to promoting children's privacy awareness and digital literacy. PrivCom's Marketing and Engagement Officer read *Warro Goes on an Adventure* aloud to enthusiastic young listeners, creating an engaging opportunity to introduce key privacy concepts in an accessible and age-appropriate way.

The event also included privacy surveys directed at parents, guardians, and teenagers aged 14–18. Survey findings relating to online behaviour, privacy awareness, and digital safety will help PrivCom build better tools, better guidance, and a stronger culture of privacy in Bermuda. Survey findings are included on pp. 38–39.

Ahead of the event, PrivCom also donated a copy of *Warro Goes on an Adventure* to the Human Rights Commission, recognising that the relationship between the two organisations is grounded in a shared notion that privacy is a fundamental human right. The Human Rights Commission welcomed the gift, acknowledging the clear connection between privacy and the dignity, autonomy, and safety of all individuals, especially children navigating today's digital spaces.



From left to right: Yukio Swan, Tiara Webb



Lisa Reed, Human Rights Commission Executive Officer

School Engagement

Members of PrivCom staff attended the Berkeley Institute Career Fair on 6 November 2025 to provide students aged 14–18 with resources and advice on careers available in privacy-related fields. In total, 11 students completed an online survey to offer their perspectives on online behaviour, privacy awareness, and digital safety. Survey findings are included on pp. 38–39.

On 26 January 2026, the Assistant Commissioner (Policy and Innovation) and the Visual Content and Training Officer delivered an interactive presentation titled ‘Online Safety for Families: A Practical Guide’ at Dellwood Middle School as part of Data Privacy Day 2026. The session focused on privacy awareness and online safety for students aged 11–14 and included a Q&A, interactive discussions, and educational quizzes on children’s privacy, with prizes for correct answers.



Nakia Pearson presenting

Data Privacy Day 2026, Seniors Tea Party, January 2026

On 28 January 2026, PrivCom hosted an event designed specifically for senior citizens to celebrate Data Privacy Day 2026. Working in partnership with Age Concern to strengthen awareness and credibility, the Office promoted the event through public outreach initiatives. On 16 January 2026, PrivCom staff members distributed 200 flyers at various locations throughout central Hamilton.

The 2026 event theme, ‘Safeguard Your Privacy’, focused on raising awareness of privacy risks affecting senior citizens, explaining rights under PIPA, and providing practical information relating to the protection of personal information. Attendees were provided with a Seniors Privacy Fact Sheet (see pp. 48–49). PrivCom staff facilitated an open discussion with attendees about the importance of protecting

personal information. The event also featured engaging trivia, prizes, and refreshments. Further details are provided in the Special Reports section of the Appendix (see pp. 48–50).



E. Angie Farquharson delivering the opening address

E. Angie Farquharson, Deputy Privacy Commissioner stated:

‘PrivCom extends its sincere gratitude to our seniors for their attendance, to Age Concern for helping us spread the word, to the PATI/PIPA Unit, and to The Honourable Minister [Diallo V. Rabain, JP, MP](#), for his insightful remarks.’

ABCO Keynote, January 2026

On 29 January 2026, the Assistant Commissioner (Policy and Innovation) delivered the keynote address to ABCO members. The presentation addressed legislative requirements relating to organisational privacy programmes under Part 2 of PIPA and key findings from Q3 and Q4 2025 statistics. Designed to inform participants about the importance of organisations establishing robust privacy programmes, the presentation underlined the need for privacy programmes to evolve and mature as complexity and circumstances change within an organisation. It also discussed each section of the legislation, highlighting the principles and conditions for using personal information under PIPA.

Government of Bermuda, International Women’s Day: Bigger! Better! Louder! Wellness Walk, 6 March 2026

For the second consecutive year, PrivCom staff participated in the International Women’s Day Wellness Walk organised by the Government of Bermuda. The event aimed to celebrate women working in public service, encourage well-being and community engagement, and strengthen connections across government departments and officers of public authorities.



E. Angie Farquharson, Gretchen Tucker, Dr. Lucie Fremlova



Government of Bermuda poster

In March 2026, an image of the PrivCom team participating in the International Women’s Day Wellness Walk 2025 was selected for use in the official promotional materials advertising the 2026 event.

Impact Measurement

During the reporting period, PrivCom collected evidence from local and international audiences through surveys, public engagement activities, and international regulatory initiatives, with the goal of assessing public understanding of privacy rights and Bermuda's global influence, identifying emerging risks, and informing future regulatory priorities. The following section summarises findings from internal and external survey activity.

Internal Surveys

The 2025 GPEN Sweep

On 25 March 2026, PrivCom released findings from the 2025 GPEN Sweep, alongside 26 other privacy enforcement authorities (PEAs) from around the world. The GPEN Sweep is an annual initiative centred on reviewing privacy practices. It aims to increase awareness of privacy rights and responsibilities, encourage compliance with privacy legislation, and enhance cooperation between international PEAs. The 2025 GPEN Sweep was coordinated by the Office of the Privacy Commissioner of Canada, the United Kingdom ICO, and the ODPa of Guernsey. It took place from 3–7 November 2025.

The theme for the 2025 Sweep was the protection of children's privacy. Participating regulators examined privacy communications and practices on websites and mobile applications used by children, including the transparency of privacy practices, use and effectiveness of age assurance mechanisms and verification, collection of children's personal information, and use of privacy protective controls. A similar children's privacy sweep was conducted by GPEN in 2015, allowing participating authorities to compare developments in online services' approaches to children's privacy over the past decade.

Global regulators participating in the 2025 GPEN Sweep observed good practices to protect children and their personal information, such as notifications advising children not to use their real names or upload images and default settings disabling location-sharing.

However, participating regulators also identified practices that raised concerns about children's privacy, noting that some risks have increased over the past decade. Compared with 2015, more online services used by children now require users to provide personal information to access full platform functionality. More platforms also indicated in their privacy policies that they may share personal information with third parties. Age assurance mechanisms to restrict children's access or interaction with online services were more common than in 2015, but were frequently easy to circumvent. This was of particular concern in instances where websites and applications included age-inappropriate content or high-risk data processing and design features affecting children.

Findings of the 2025 GPEN Global Sweep

The GPEN Sweep evaluated almost 900 websites and mobile applications used by children. Key findings included the following:

- **Age assurance:** For 72% of websites and mobile applications reviewed, participants were able to circumvent age assurance measures, most often where self-declaration was used.
- **Collection of children's personal information:** More than half (59%) of the websites and mobile applications reviewed required the collection of an email address to access the full functionality of the platforms, while 50% required usernames and 46% required geolocation. Overall, participants noted an increase in the collection of certain types of personal information compared to 2015.
- **Protective controls:** 71% of the websites and mobile applications reviewed did not provide information about protective controls and privacy practices tailored to children.
- **Account deletion:** More than one third (36%) of the websites and mobile applications did not provide an accessible way to delete accounts.
- **Inappropriate content and high-risk design features:** Only 35% of the websites and mobile applications identified as involving high-risk use of personal information or design features for children provided privacy information (such as a pop-up) directing young people to seek parental permission before continuing to use the platform.



Protecting Children’s Privacy in Bermuda

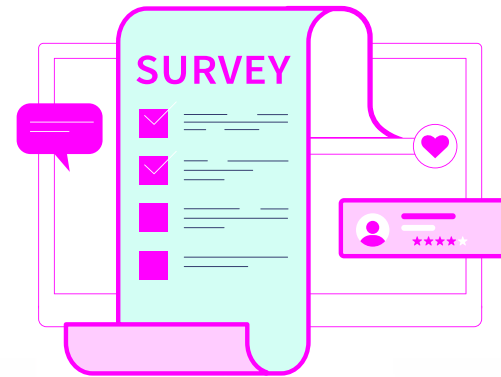
Community Insights

Under PIPA, additional protections apply to the personal information of children in the information society. During the reporting period, PrivCom prioritised education and awareness activities for children, parents, guardians, educators, and organisations providing information society services to children. These activities focused on the requirements of Section 16 of PIPA as it relates to uses of children’s personal information online, including through digital services and platforms designed for or used by children.

As part of this work and the Office’s broader commitment to safeguarding privacy, PrivCom engaged directly with parents, guardians, and educators. During the annual Children’s Reading Festival hosted by the Bermuda Alumnae Chapter of the Delta Sigma Theta Sorority Incorporated, PrivCom staff members attended and engaged with visitors to better understand community perspectives on children’s digital safety and privacy (see p. 33 for details). Visitors to PrivCom’s information booth were invited to complete the Protecting Children’s Privacy in Bermuda: Community Insight Survey. A total of ten responses were received, with nine completed responses, representing a 90% completion rate.

Youth engagement was also undertaken at the Berkeley Institute Career Fair on 6 November 2025, where students aged 14–18 were invited to share their perspectives on online behaviour, privacy awareness, and digital safety (see p. 34 for details). In total, 11 students participated in the online survey titled ‘Your Privacy, Your Power: Youth Voices’.

The two samples were small and are not representative of the wider population; nonetheless, they contain valuable insights. The findings provide useful qualitative insight into community concerns and awareness needs. The section below provides the findings of the two surveys.



Survey Findings

Respondents were asked how confident they felt discussing online privacy and safety with children. Overall, 80% of respondents reported high confidence discussing online safety, suggesting strong awareness among parents, guardians, and educators, while a smaller proportion indicated a need for further support and guidance.

Respondents were also asked how often they discussed online privacy and safe sharing with children and to identify their primary concerns regarding children’s online activity. The most frequently identified concerns were:

- **oversharing personal information:** 100% (nine respondents);
- **cyberbullying:** 77.8% (seven respondents);
- **online gaming and chat interactions:** 55.6% (five respondents);
- **social media and image sharing:** 55.6% (five respondents); and
- **AI tools and privacy:** 33.3% (three respondents).

Respondents reported discussing online safety with children at the following frequencies:

- **weekly:** 22.2% (two respondents);
- **occasionally:** 22.2% (two respondents);
- **rarely:** 44.4% (four respondents); and
- **never:** 11.1% (one respondent).

Notably, no respondents identified government campaigns as a primary source of information regarding children’s privacy. This indicates an opportunity to expand awareness of official privacy resources. Common resources cited as helpful for parents and educators in communicating with children included:

- **guides or tip sheets for parents and educators:** 55.6% (five respondents);
- **lesson plans or classroom activities:** 44.4% (four respondents);
- **short videos or online content:** 44.4% (four respondents);
- **online resources:** 33.3% (three respondents); and
- **workshops or talks:** 22.2% (two respondents).

In the student survey, the age distribution among the 11 student respondents was as follows:

- **14 years old:** 45.5% (five respondents);
- **16 years old:** 36.4% (four respondents);
- **15 years old:** 9.1% (one respondent); and
- **18 years old:** 9.1% (one respondent).

Students reported high levels of online activity and engagement, highlighting the significant role digital environments play in young people’s daily lives:

- 72.7% (eight respondents) reported being online ‘all day, every day’.
- 18.2% (two respondents) reported being online a few hours a day.
- 9.1% (one respondent) reported being online only sometimes.

Students also reported regular use of a range of social media and online platforms, demonstrating that social media continues to be the main digital environment for communication and information-sharing among young people. The prominence of TikTok and Instagram indicates that short-form video and social networking sites are the key spaces for youth interactions. Platforms used by respondents included:

- **TikTok:** 90.9% (ten respondents);
- **Instagram:** 81.8% (nine respondents);
- **Snapchat:** 54.5% (six respondents);
- **YouTube:** 45.5% (five respondents);
- **Roblox:** 36.4% (four respondents);
- **Discord:** 18.2% (two respondents); and
- **WhatsApp:** 9.1% (one respondent).

Students were also asked how often they considered privacy when sharing content online. While 63.6% (7 respondents) reported thinking about privacy always, usually, or at least sometimes, 36.4% (4 respondents) indicated that they rarely or never considered privacy or who might see their posts when sharing content online.

Most student respondents reported knowing how to change privacy settings on their favourite applications. Overall, the findings indicate the importance of continued youth engagement and privacy education to equip young people with the knowledge and skills needed to safeguard their personal information.

Data Privacy Day 2026: Seniors Privacy Survey

To assess the impact of the Seniors Tea Party, held on 28 January 2026 to celebrate Data Privacy Day, participants were invited to complete a survey at the end of the event. Of the 107 participants, 58 completed the survey.



Participants were asked to reflect on their level of understanding before and after the event. Responses highlighted a clear knowledge gap before the event:

- Nearly 45% of respondents reported low or no familiarity with their rights under PIPA.
- Only 15% indicated familiarity with their privacy rights prior to the event.

By the end of the event, responses showed a marked improvement:

- 64% of respondents reported feeling confident or very confident in their ability to exercise their privacy rights under PIPA.
- 34% of respondents reported feeling more confident.
- 98% of respondents reported increased confidence overall.

The results indicate the impact of privacy education that is accessible, practical, discussion-based, and grounded in real-world experiences. Seniors were not only informed and more confident, but they also felt better equipped to ask questions, identify risks, and exercise their rights under PIPA. This change from uncertainty to confidence underscores the effectiveness of the event's approach.

Further details on the event are included in the Special Report provided in the Appendix (pp. 48–50).



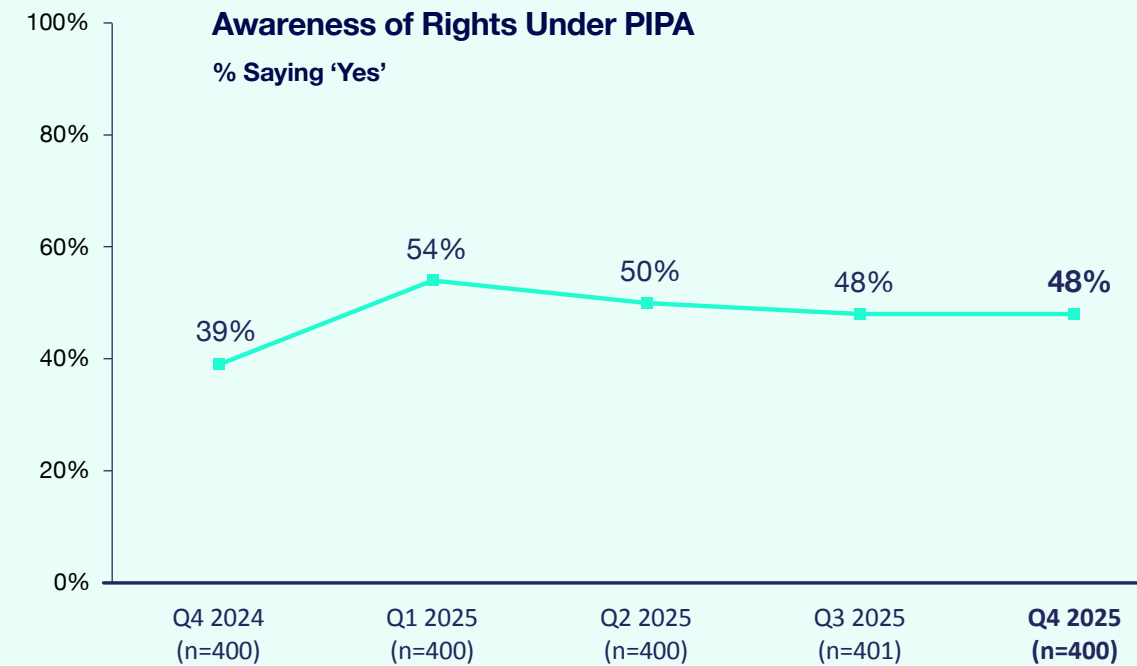
External Surveys

Between Q2 and Q4 2025, PrivCom commissioned three Bermuda Omnibus Surveys from Narrative Research to establish and assess levels of awareness of PIPA post-implementation.

The findings of the three consecutive surveys indicate that:

- awareness of individual rights under PIPA remained higher than pre-implementation levels;
- awareness of individual rights under PIPA in Q4 2025 was broadly consistent with Q3 and Q2 2025; and
- Bermuda residents continued to report learning about their rights under PIPA primarily through their workplace or work-related training.

Throughout the reporting period, approximately half (48%) of the population reported awareness of individual rights under PIPA, consistent with results seen throughout 2025. Over the year, there was a small decrease in the percentage of individuals aware of their rights under PIPA, with awareness levels dropping from 54% in Q1 to 50% in Q2 and then 48% in Q3. This small decrease in awareness fell within the survey's sampling margin of error.



Q.01: Are you aware of what your rights are under the Personal Information Protection Act 2016, which took effect on 1 January 2025?

Narrative Research graph 1

Awareness of individual rights under PIPA in Q4 2025 remained broadly consistent with Q2 and Q3 2025, following a peak in Q1 2025 after the full enactment of PIPA on 1 January 2025. Awareness levels across the population seemed to have reached a plateau – at roughly half – in the two quarters of 2025. Although general awareness remained stable, specific understanding of PIPA declined during the reporting period: understanding of consent decreased from 52% to 45%; understanding of security of personal information decreased from 53% to 37%; understanding of the right to access one’s personal information decreased from 36% to 23%; understanding of the right to know how one’s personal information is used decreased from 34% to 22%; and the number of respondents answering ‘don’t know’ increased from 9% to 11%.

Awareness of Rights Under PIPA

Key Unaided Mentions Among Those Aware of the Act

	Q4 2024 (n=161)	Q1 2025 (n=217)	Q2 2025 (n=207)	Q3 2025 (n=190)	Q4 2025 (n=190)
Consent before sharing or disclosing personal information	27%	37%	51%	52%	45%
Security of personal information/data privacy and confidentiality	25%	33%	49%	53%	37%
Right to access personal information	13%	19%	32%	36%	23%
Right to know how personal information is used	8%	13%	30%	34%	22%
Right to request deletion of personal information	15%	11%	24%	33%	17%
Right to decline unnecessary data collection or to opt out of certain uses	9%	10%	21%	29%	16%
Don't know	24%	12%	13%	9%	11%

Q.O2: [IF 'YES' IN Q.O1] What rights, under the Personal Information Protection Act, are you aware of?

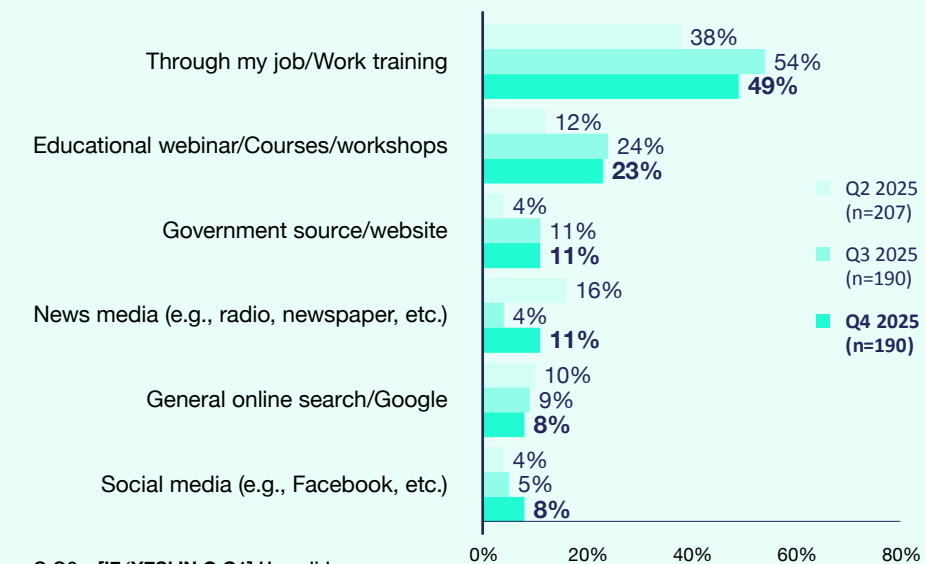
Narrative Research graph 2

In Q4 2025, Bermuda residents continued to report that they were primarily informed about their rights under PIPA through their job or work-related training (38% in Q2, 54% in Q3, and 49% in Q4). Other reported sources of information included:

- educational webinars, courses, or workshops (12% in Q2, 24% in Q3, and 23% in Q4);
- government sources or websites (4% in Q2, 11% in Q3, and 11% in Q4);
- news media (16% in Q2, 4% in Q3, and 11% in Q4);
- general online searches or Google (10% in Q2, 9% in Q3, and 8% in Q4); and
- social media (8% in Q2, 5% in Q3, and 4% in Q4).

How Individuals Received Information on Rights Under PIPA

Key Unaided Mentions Among Those Aware of the Act



Q.O2a: [IF 'YES' IN Q.O1] How did you receive information on your rights under the Personal Information Protection Act?
New question in Q2 2025.

Narrative Research graph 3

International Affiliations

Overview

PrivCom collaborates with its international counterparts and global regulatory networks to bolster Bermuda’s standing as a regulatory leader in privacy and data protection matters. These engagements led to concrete initiatives, including joint conferences, engagements, and research, which strengthen global privacy enforcement and cooperation. These affiliations help ensure that PrivCom’s guidelines and actions align with regulatory standards and best practices in order to safeguard individuals’ personal information in Bermuda and globally.

Active Engagement

During the reporting period, PrivCom actively engaged with the following networks:

British, Ireland and Islands Data Protection Authorities (BIIDPA)

A regional network of Privacy Commissioners, BIIDPA brings together data protection and privacy regulators from the following jurisdictions: Bermuda, Cayman Islands, Cyprus, Gibraltar, Guernsey, Ireland, Isle of Man, Jersey, Malta, and the United Kingdom. BIIDPA meets annually, with informal collaboration throughout the year. Bermuda has been a member since January 2020.

During the reporting period, PrivCom actively engaged with BIIDPA at the annual meeting in Guernsey (for further details of the event, see p. 30). The meeting served as an opportunity for Privacy Commissioners from DPAS in British Overseas Territory and Crown Dependency jurisdictions to share ideas and best practice.

Global Privacy Assembly (GPA)

The GPA serves as the premier global forum for privacy leaders and data protection regulators. It brings together more than 130 data protection and privacy watchdogs worldwide to share updates, adopt resolutions, and discuss emerging challenges. First convened in 1979, the GPA has been in existence for more than four decades; until 2019, it was known as the International Conference of Data Protection and Privacy Commissioners. In September 2020, PrivCom joined the GPA as an accredited member and then hosted the 45th GPA in Bermuda in October 2023. To learn more, read the write-up ([‘Bermuda 2023 GPA Annual Meeting: Ripples, Waves and Currents’](#)) or watch the recordings ([‘45th Annual Global Privacy Assembly Open Sessions’](#)) on YouTube.

During the reporting period, PrivCom actively engaged with the GPA as a participant at the 47th GPA in Seoul, South Korea, a co-sponsor of two GPA AI-related resolutions, and a signatory of the GPA’s joint statement on AI-generated imagery (for more details, see the Special Report in Appendix, pp. 46–47).

GPA’s Enforcement Cooperation Agreement

The GPA’s Enforcement Cooperation Agreement supports cooperation between participating authorities in relation to cross-border data protection compliance and enforcement activity. The agreement encourages and facilitates cooperation by sharing information, particularly confidential enforcement-related information about potential or ongoing investigations. Where appropriate, it also coordinates participants’ enforcement activities to ensure that resources can be used as efficiently and effectively as possible. PrivCom has been a participant since February 2023.

Global Privacy Enforcement Network (GPEN)

The GPEN was established in March 2010 following the OECD Recommendation on Cross-border Co-operation in the Enforcement of Laws Protecting Privacy, which called for member countries to foster the establishment of an informal network of PEAs. GPEN connects PEAs from around the world to promote and support cooperation in the cross-border enforcement of laws protecting privacy; PrivCom has been a member since February 2023. During the reporting period, the Office actively participated in the annual GPEN Sweep focused on the protection of children's privacy (for more details, see pp. 36–37).

Global Cross-Border Privacy Rules (CBPR)

In April 2024, PrivCom joined the Global CBPR Forum as a PEA from outside the Asia-Pacific region under the Global Cooperation Arrangement for Privacy Enforcement (CAPE), a multilateral arrangement designed to facilitate cross-border enforcement of data protection and privacy laws. In the reporting period, former Privacy Commissioner White represented PrivCom at the Global CBPR Forum and actively engaged as a conference participant and speaker (for more details, see pp. 29).

Memorandum of Understanding (MOU)

PrivCom has solicited relations with DPAs in several jurisdictions that share common privacy philosophies and legal characteristics with Bermuda. These include formal MOU agreements with Guernsey, the Philippines, Dubai, and Abu Dhabi (United Arab Emirates); as well as regular engagement with the Bahamas, Jamaica, Barbados, and Newfoundland (Canada).

International Age Assurance Working Group (IAAWG)

Led by the United Kingdom ICO since 2024, the IAAWG meets online three to four times a year, bringing together international representatives of data protection and privacy regulators working on age assurance technologies and mechanisms. The group supports and coordinates multilateral initiatives, including joint statements on age assurance. PrivCom has been a participant since 2024. The Assistant Commissioner (Policy and Innovation) attended quarterly virtual meetings hosted by the working group.

Additional Affiliations

During the reporting period, PrivCom had additional affiliations with the following initiatives:

Digital Clearinghouse

The Digital Clearinghouse is an initiative launched by the European Data Protection Supervisor to support exchange around privacy and data protection issues. The Digital Clearinghouse works to create a platform facilitating cooperation, dialogue, and exchange of insights and best practices between regulatory authorities, policymakers, researchers, and other stakeholders. PrivCom has been a member since January 2020.

International Working Group on Data Protection in Technology (IWGDPT)

The IWGDPT, also known as the 'Berlin Group', specialises in data protection issues relating to emerging technologies, including blockchain and facial recognition. PrivCom has been a member since February 2020.

Internet Privacy Engineering Network (IPEN)

Founded by the European Data Protection Supervisor, the IPEN promotes privacy engineering and the development of privacy-enhancing technical approaches. PrivCom has been a member since May 2020.

The Common Thread Network (CTN)

The CTN supports the sharing of experience, knowledge, and expertise across jurisdictions in Commonwealth nations. PrivCom has been a member since May 2020.

Asia Pacific Privacy Authorities (APPA) Forum

The APPA Forum is the principal regional network for privacy regulators and DPAs in the Asia-Pacific region. PrivCom has been an observer since June 2020.

Caribbean Community (CARICOM)

Bermuda is an Associate Member of CARICOM, which promotes economic integration and cooperation throughout the Caribbean region. PrivCom has been participating in working groups, including the Information and Communication Technology for Development (ICT4D) programme, since October 2020.

Council of Europe Convention 108+ Consultative Committee

The C108+ Consultative Committee is responsible for interpreting, facilitating, and improving the implementation of the provisions of Convention 108. PrivCom has been an observer since November 2020.

MESSAGE OF GRATITUDE

PrivCom wishes to extend our sincere gratitude to Alexander White for his dedication to advancing the regulatory data protection and privacy rights regime in Bermuda during his tenure as Bermuda's first Privacy Commissioner.



Alexander White

Privacy Commissioner
from 20 January 2020 to
30 September 2025

Alexander White served as Privacy Commissioner from 20 January 2020 to 30 September 2025. During his tenure, Alexander White was responsible for the strategic establishment of the Office of the Privacy Commissioner for Bermuda (PrivCom), inclusive of the recruitment of staff to develop the capacity of PrivCom to successfully deliver educational and awareness campaigns in the lead up to the full enactment of the Personal Information Protection Act 2016 (PIPA) and to further deliver the regulatory supervision mandate once the Act came into force from 1 January 2025. He played an instrumental role in PrivCom gaining international recognition as a national Data Protection Authority (DPA) and also fostered partnerships with working groups, forums, and international data protection groups to ensure that PrivCom could directly participate in cross-border regulatory activity to support and achieve shared goals and objectives.

He also cultivated relationships with organisations within Bermuda, which have been critical to PrivCom's maturing as both a new independent public authority and as Bermuda's first data protection enforcement agency.

This thoughtful leadership in public service has supported a foundation for the future work of PrivCom and for the continued development of a culture of privacy, accountability, transparency, and trust within the jurisdiction.

PrivCom thanks Bermuda's former Commissioner Alexander White for his contributions and wishes him every success in his appointment as Privacy Commissioner for Queensland, Australia. PrivCom would further like to thank all of the stakeholders both in Bermuda and abroad that engaged in consultation, PIPA training, conferences, and various regulatory engagements to support the work.

APPENDIX

Special Reports

47th Global Privacy Assembly (GPA)

The 47th GPA took place in Seoul, South Korea, from 15–19 September 2025. The event was attended by the former Privacy Commissioner White, the Deputy Commissioner, and the Assistant Commissioner (Operations). The former Commissioner drew on his experience at the Office of the Privacy Commissioner for Bermuda (PrivCom) as a participant in a panel session on capacity-building for data privacy authorities.

The central theme of the Assembly was 'Artificial Intelligence in Our Daily Lives: Data and Privacy Issues'. The programme addressed AI's impact on privacy and data protection through 20 panel sessions, 10 policy forums, and various corporate and institutional visits, exhibition booths, and cultural experiences. The Assembly provided a platform for sharing global insights on a wide variety of important topics, including AI governance, privacy-enhancing technologies, cross-border transfer of personal information, and child and youth privacy protection.

The programme featured keynote addresses (for example, by EU Commissioner Michael McGrath), panel discussions, parallel sessions on topics like youth privacy and data protection authority (DPA) institutionalisation, welcome receptions, site visits, and an Open-Source Day. Participants adopted resolutions on pressing issues, with full reports available post-event. Offsite sessions on topics including best practices in digital governance and a privacy were held at the Seoul Metropolitan Government, the Samsung Innovation Museum, and the Hyundai Motorstudio.

Co-Sponsored GPA Resolutions

The 47th GPA in Seoul resulted in several significant outcomes relating to AI data governance, including three adopted resolutions and a joint statement by 20 data protection authorities (DPAs) committing to trustworthy AI frameworks that clarify legal bases, enhance security, monitor societal impacts, reduce uncertainty for innovators, and boost regulator cooperation.

DPAs from around the world also issued two milestone resolutions related to AI, co-sponsored by PrivCom. They were as follows:

[Resolution on the Collection, Use and Disclosure of Personal Data to Pre-Train, Train and Fine-Tune AI Models](#)

The resolution on AI training addressed the use of personal information in the development and training of AI models to ensure it is handled in a lawful, fair, transparent, explainable, and accountable manner. The resolution:

- affirms that AI training must comply with existing privacy and data protection laws;
- warns against the indiscriminate scraping of publicly available personal information without a lawful condition for using it;
- calls for stronger cross-border enforcement cooperation among DPAs to oversee global AI systems; and
- promotes global engagement with the Organisation for Economic Co-operation and Development, the Council of Europe, and United Nations bodies to advance trustworthy AI governance.

[Resolution on Meaningful Human Oversight of Decisions Involving AI Systems](#)

This resolution emphasised that human oversight is essential to ensuring automated decision-making (ADM) systems respect fundamental human rights, including privacy, lawfulness, and fairness. The resolution:

- reaffirms that individuals must not be subject to fully automated decisions without meaningful human review and safeguards;
- stresses that oversight must be effective, informed, and empowered, not symbolic or procedural;
- warns that automation can undermine transparency, explainability, and accountability if humans cannot understand or challenge system outputs;
- calls for clear governance frameworks so humans can intervene, override, or audit algorithmic decisions; and
- highlights the need for strong protections where decisions impact employment, access to services, vulnerable persons, or other fundamental rights.

GPA Joint Statement on AI-Generated Imagery

Acting Privacy Commissioner E. Angie Farquharson signed a [Joint Statement on AI-Generated Imagery](#). It was published in February 2025 by DPAs across the globe and coordinated by the GPA's International Enforcement Cooperation Working Group.

The statement represents the united position of 61 data protection and privacy watchdogs in response to serious concerns about AI systems that generate realistic images and videos depicting identifiable individuals without their knowledge and consent.

It also outlines key expectations and fundamental principles for all organisations developing and using AI content generation systems.

The co-signatories remind all organisations developing and using generative AI systems that such systems must be developed and used in accordance with applicable laws and regulations, including data privacy legislation such as the Personal Information Protection Act 2016 (PIPA). The harms arising from non-consensual generation of intimate, defamatory, or otherwise harmful content depicting real individuals are significant and call for urgent regulatory attention.

The co-signatories aim to share information on their approaches to addressing concerns, including in the areas of enforcement, policy, and education and awareness, and have developed a timeline for implementation in 2026.

Special Highlights from the 47th GPA

Outgoing Privacy Commissioner White participated in a panel session to discuss capacity-building for DPAs. He was joined by Haksoo Ko, Chair of the Personal Information Protection Commission (PIPC) Korea; Andreas Hartl, Deputy Commissioner for Data Protection and Freedom of Information, Germany; and Lew Chuen Hong, Commissioner for the Personal Data Protection Commission, Singapore.

Participants also witnessed the election of the new GPA Chairman Philippe Dufresne, the Privacy Commissioner of Canada.

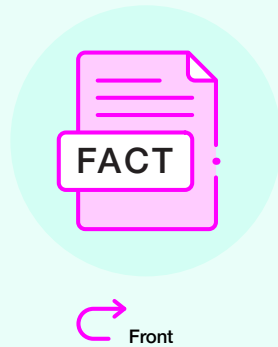
PrivCom was honoured to be shortlisted for an award in the category of education and awareness for its 'Road to PIPA' programme. The 37-week programme was designed to help organisations of every size prepare for the full PIPA enactment on 1 January 2025.

Seniors Privacy Fact Sheet

On the occasion of the Seniors Tea Party held on 28 January 2026 in celebration of Data Privacy Day 2026, PrivCom produced a Seniors Privacy Fact Sheet. The goal of creating the Fact Sheet was to raise the attendees' awareness of PIPA, the four individual privacy rights under PIPA, and the steps individuals can take when exercising their rights with respect to how their personal information is being used by organisations in Bermuda. Each attendee received a copy of the Fact Sheet and was able to familiarise themselves with the content of the document during the one-on-one session. Finally, the attendees were able to test their understanding and knowledge of privacy and PIPA during the trivia session, with prizes awarded, including vouchers and gift certificates.



Seniors Tea Party, Data Privacy Day 2026



The Office of the Privacy Commissioner for Bermuda (PrivCom) serves to protect the rights of individuals in relation to their personal information through the regulatory enforcement of the Personal Information Protection Act 2016 (PIPA). PIPA came into full effect on 1 January 2025.

Below, PrivCom offers a snapshot of PIPA.

What is personal information?

Under Section 2 of PIPA, personal information is any information that relates to an identified or identifiable individual. Examples include, but are not limited to, names, date of birth, photographs, video footage, email addresses, and telephone numbers. Examples of sensitive personal information under section 7 of PIPA include, but are not limited to, an individual's place of origin, race, colour, national or ethnic origin, sex, marital status, physical or mental health, etc.

What are your rights under PIPA?

- Right to access your personal information (section 17) and medical records (section 18)
- Right to have your personal information corrected (section 19)
- Right to have your personal information erased or destroyed (section 19)
- Right to block the use of your personal information (section 19)

Importantly, some legal exemptions or exclusions may apply. This means that you may not always be able to exercise the above rights under PIPA. When appropriate, there are also grounds to disregard or refuse a PIPA rights request (PRR).

How do organisations use personal information?

Under PIPA, an "organisation" is any entity, public authority or individual that uses personal information, for example, a bank, school, medical centre or government. Organisations may use personal information in many ways for various purposes.



Under PIPA, every organisation that uses personal information in Bermuda must protect individuals' personal information and uphold the rights of individuals.

An organisation must inform you if, how and who it discloses your personal information to. This can be found in the organisation's clear and accessible privacy notice. This is in accordance with section 9 of PIPA. Organisations must include the contact details of their Privacy Officer (PO) in their privacy notice. An individual should contact an organisation's PO if they wish to exercise their rights under PIPA.

How to exercise your individual rights under PIPA

1. Contact the organisation

If you suspect that an organisation is using your personal information contrary to the requirements under PIPA, you must contact the organisation in writing first. Let them know what your concern is by contacting the organisation's PO.

2. Make a PIPA rights request (PRR)

To exercise your individual rights under PIPA, you must submit a PIPA rights request (PRR) to the organisation in writing. For example, if you need to obtain a copy of your personal information, submit a PRR to the organisation.

According to section 20(3) of PIPA, an organisation must promptly acknowledge in writing receipt of your PRR. The acknowledgement must include the date of the PRR, and the organisation must, at the same time, inform you if there is insufficient detail in your PRR, what information is required to complete your PRR.

An organisation must respond to your PRR within 45 calendar days of receipt of your complete PRR, or by the end of the extension period if an extension of 30 calendar days has been granted to the organisation as per section 20(6) of PIPA, unless an exclusion or an exemption applies.

If the organisation does not respond to you or you are not satisfied with the organisation's response, you can submit a written request to PrivCom. The written request intake form can be found at www.privacy.bm or obtained by calling PrivCom at 543-7748.

3. Submit a written request to PrivCom

DISCLAIMER: This fact sheet does not constitute legal or other professional advice.

You should consult with your professional legal advisor for legal or other professional advice.

Data Privacy Day 2026

Data Privacy Day is celebrated annually on 28 January to raise awareness of the importance of protecting personal information and respecting privacy rights in an increasingly digital world. It marks the anniversary of a milestone treaty that enshrined privacy as a fundamental human right. In 1981, various countries in Europe came together and committed to respect their citizens' privacy under what is known as the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data – Convention 108. Adopted on 28 January 1981, it has since been ratified five times, resulting in Convention 108+.

On 28 January 2026, PrivCom celebrated Data Privacy Day by hosting a Seniors Tea Party. Over 100 seniors gathered for the event at Saint Paul African Methodist Episcopal Church as part of a national effort to reinforce awareness and understanding of individual rights under PIPA. The event was delivered in partnership with Age Concern, whose support strengthened outreach and engagement within Bermuda's senior population. Awareness of the event was advanced through telephone outreach rather than emails, which proved more effective, as well as multi-channel promotion through radio interviews, press releases, flyers, word of mouth, and ministerial presence. On the day of the event, PrivCom also engaged its privacy partners, including Gilbert Rowling and Dr. Nicola O'Leary of the Government of Bermuda PATI/PIPA Unit and Nancy Volesky, a privacy consultant.

The Acting Privacy Commissioner formally opened the session with a welcome address, followed by remarks from Minister Diallo Rabain, JP, MP. Minister Rabain reinforced his support of public awareness initiatives that promote accountability, transparency, and individual rights under PIPA. The Acting Privacy Commissioner then delivered a presentation underscoring the importance

of safeguarding privacy. She highlighted the importance of sensitive personal information and how the provisions regarding consent as a condition for using personal information under PIPA apply. She also outlined fairness, proportionality, and purpose limitation as some of the general principles and rules under Part 2 of PIPA; further, she informed the participants about the meaning of a breach of personal information and the organisation's responsibility for a breach under PIPA. Participants were reminded that they should be notified by organisations if they have been affected by a breach of personal information. Finally, seniors were informed of their privacy rights under PIPA. Reference was made to the Seniors Privacy Fact Sheet (see pp. 48–49).

Following these speeches, the session transitioned into structured discussion where each PrivCom staff member was allocated a table to engage with the attendees in a one-on-one approach. During 'Privacy Time', participants engaged with PrivCom staff and partners to explore common privacy scenarios, clarify their rights under PIPA, review the Seniors Privacy Fact Sheet in detail, and examine practical steps individuals can take when concerns arise regarding how their personal information is being

used by organisations. The approach was intentionally dialogue-based, conversational, and personal, allowing seniors to raise questions or concerns, share experiences, and participate in shared learning in a safe and accessible setting. The atmosphere reflected not only learning but assurance.

The participants were able to enjoy a refreshment break. The different information-sharing formats enabled the participants to acquire the necessary information and knowledge, which was subsequently tested in a fun and interactive privacy-focused trivia segment. Participants demonstrated their understanding of key concepts, with prizes awarded, including vouchers and gift certificates.

To assess impact, participants were asked to complete a survey at the end of trivia, reflecting on their understanding before and after the session. Nearly half of participants indicated limited familiarity with their privacy rights prior to attending. By the end of the session, 98% reported feeling more confident in their ability to exercise their individual rights under PIPA. This measurable increase in confidence is significant.

Data Privacy Day serves as a reminder that safeguarding personal information requires both institutional oversight and public awareness. As digital environments evolve, continued education and community engagement remain critical to ensuring that individuals, particularly vulnerable populations, understand their rights and how to assert them.

Press Highlights



'PrivCom is launching the 2025 iteration of the Pink Sandbox' (<http://privacy.bm/post/privcom-is-launching-the-2025-iteration-of-the-pink-sandbox>)

'Commissioner White appointed to role of Queensland Privacy Commissioner' (<https://www.privacy.bm/post/commissioner-white-appointed-to-role-of-queensland-privacy-commissioner>)

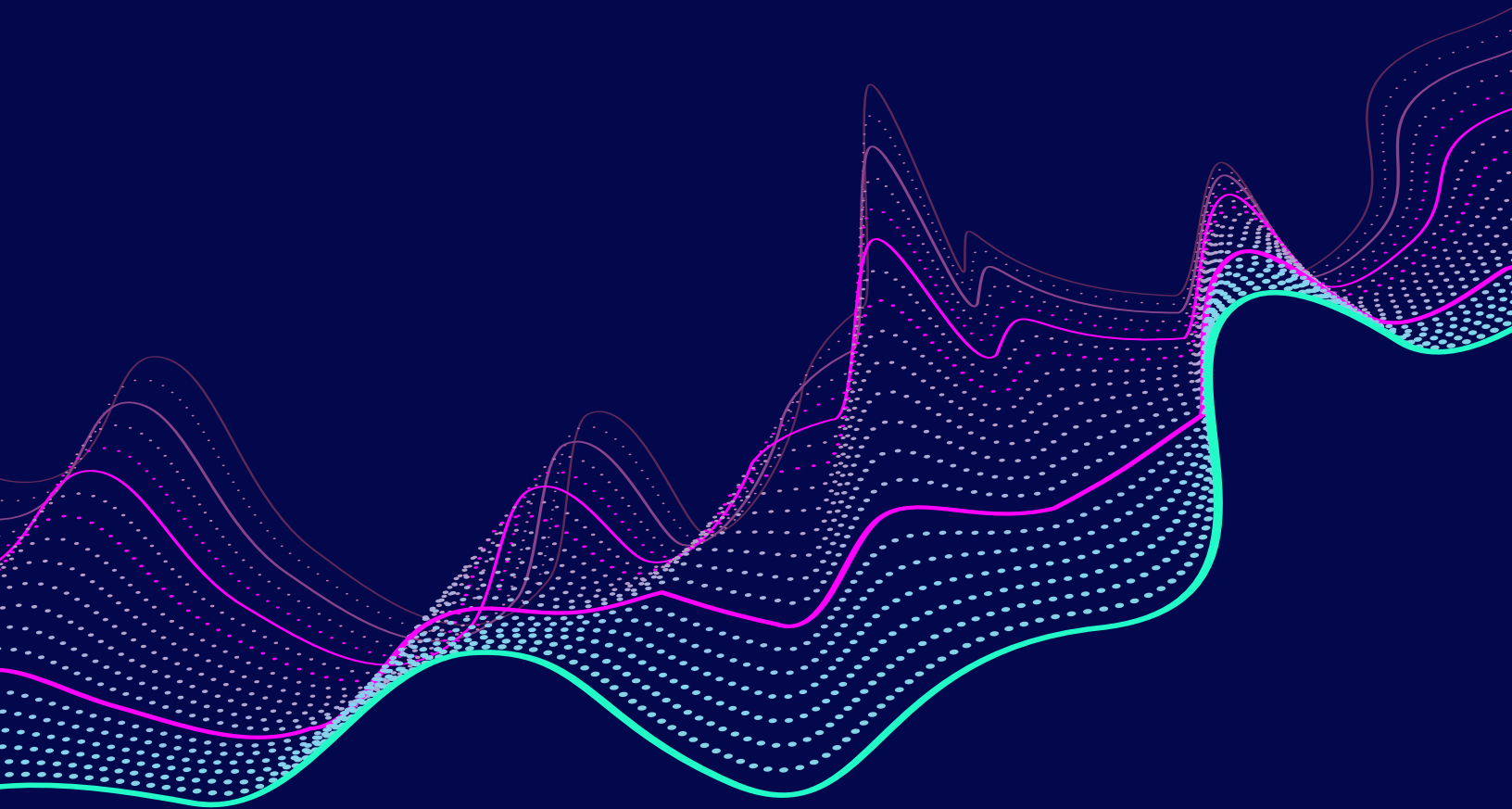
'2025 Global Privacy Enforcement Network sweep focuses on the protection of children's privacy' (<https://www.privacy.bm/post/2025-global-privacy-enforcement-network-sweep-focuses-on-the-protection-of-children-s-privacy>)

'PrivCom receives children's privacy book donation and shares gift with Human Rights Commission' (<https://www.privacy.bm/post/privcom-receives-children-s-privacy-book-donation-and-shares-gift-with-human-rights-commission>)

'PrivCom donates children's privacy storybook to the Florenz Webbe Maxwell Youth Library' (<https://www.privacy.bm/post/privcom-donates-children-s-privacy-storybook-to-the-florenz-webbe-maxwell-youth-library>)

'PrivCom to mark Data Privacy Day 2026 with a Seniors Tea Party' (<https://www.privacy.bm/post/privcom-to-mark-data-privacy-day-2026-with-a-seniors-tea-party>)

'PrivCom releases the first of a series of guidance notes on recording in public' (<https://www.privacy.bm/post/privcom-releases-the-first-of-a-series-of-guidance-notes-on-recording-in-public>)

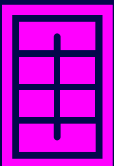


**The Office of the Privacy
Commissioner for Bermuda**

Maxwell Roberts Building
4th floor
1 Church Street
Hamilton HM1 1
Bermuda

Tel: 441-543-7748

Web: www.privacy.bm



Privacy Commissioner

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