Useful ≠ necessary.

Session 2 · LAW — what allows or limits this?

Last time I talked, a lot. Today you will work together on a case :D.

Keep your phone. You'll need it in a few minutes.

This is a job.

What people are paid to do with the questions we practise here.

THE WORK

Look at a system that collects data about people. Decide whether it should exist — and how.

Professionally: a Data Protection Impact Assessment (GDPR Art. 35).

WHO NEEDS IT

Every organisation under GDPR, since 2018. From December 2027 the EU AI Act adds high-risk AI systems to the list.

Banks, hospitals, ministries, start-ups, NGOs, universities.

WHAT IT'S CALLED

Data Protection Officer · privacy or GRC analyst · risk consultant.

Credentials you'll meet: IAPP CIPP/E · CIPM · CIPT.

Your internship search starts in a few months.

Why should we learn this?

Privacy work sits where law, risk, business, technology and communication meet.

Lille · Consultant DPO

Numih France is hiring a full-time DPO/privacy consultant in Lille. Work includes audits, records of processing, DPIAs, policies, interviews, training, breach response and data-subject rights.

LIVE ROLE · NUMIH FRANCE

Paris · Junior Cyber / Privacy

Sia recruits junior consultants into cyber risk, compliance, DPO-as-a-service and Data Privacy Assurance. The role accepts graduates from engineering, business schools or universities.

LIVE ROLE · SIA

Assistant DPO · Internship

Veolia has a 6-month Assistant DPO internship starting Sep/Oct 2026: maintain the processing register, support compliance controls and participate in privacy governance.

LIVE ROLE · VEOLIA

What keeps recurring?

Map the processing.
Ask what is lawful and necessary.
Run DPIAs. Assess risk. Advise managers. Document decisions.
Redesign systems. Communicate clearly.

THAT IS WHAT WE PRACTISE HERE

You do not have to become a lawyer or a DPO. These are transferable governance and risk skills.

Sources are current as of 24 Sep 2026. Job listings may close.

What does privacy career look like?

Titles: DPO, privacy analyst, GRC analyst, privacy consultant, cyber compliance, AI governance. (do a search?)

€41k - €75k

Glassdoor base-pay range for "DPO Data Protection Officer" in Île-de-France
Average base about €49-50k/year

The employable bundle

LEGAL	GDPR principles, lawful bases, rights
RISK	DPIA, proportionality, controls
BUSINESS	understand why the system exists
TECH	data flows, vendors, security, AI
COMMUNICATE	turn analysis into a decision

This is why International Relations + Risk Management is not a strange background for the field.

Live examples today: Numih (Lille), Sia (Paris), Veolia (Aubervilliers).

Sources are current as of 24 Sep 2026. Job listings may close.

A route into the field

There is no single licence to practise privacy. There are professional communities and voluntary credentials.







Learn the work → build examples → internship / junior role → specialize → certify.

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A route into the field

There is no single licence to practise privacy. There are professional communities and voluntary credentials.

AFCDP · France

The French data-protection professionals association explicitly includes DPOs, lawyers, HR specialists, IT/security people, consultants, academics and students. It runs peer groups, events, resources and a job board.

COMMUNITY · AFCDP

IAPP · CIPP/E

The CIPP/E is an ANAB-accredited credential focused on European data-protection law, terminology and practical concepts. It is widely used in the privacy profession.

CREDENTIAL · IAPP

CNIL-referenced DPO certification

France also has a voluntary DPO competency certification. It is not required to be a DPO. Current prerequisites include 2 years of relevant experience, or 2 years of professional experience plus 35 hours of privacy training.

LATER-CAREER OPTION · CNIL

Learn the work → build examples → internship / junior role → specialize → certify

Sources are current as of 24 Sep 2026. Job listings may close.

What are we learning/practicing? A “DPIA”-shaped way to think

Our six questions are a teaching decomposition of real privacy / risk work - not an official six-step industry standard.

MAP	LAW	RISK	HANDOFF	DECIDE	REDESIGN
What is actually happening?	What allows or limits it?	What could happen, to whom?	Who else may gain control?	What should we do?	Keep the value; reduce the danger.

TODAY: LAW

PURPOSE	What exactly are we trying to accomplish?
NEED	Does this data materially help?
LESS?	Could we achieve it with less / less intrusive data?
PERMISSION	What legal basis permits it?

Sources are current as of 24 Sep 2026. Job listings may close.

Course Overview

One real case per session. You decide before you know how it ended. Then we find out.

1 **NOW**

We analyse a case together.

2 **OCTOBER → NOVEMBER**

You do pieces of the analysis — in pairs, then alone.

3 **DECEMBER**

You receive a case you have never seen. Two hours. Alone.



Today's case: 2009/10. A government payroll. A city you know from the news. You will design it before you learn what happened to it.

You clicked “Agree.” What did you agree to?

Class organization tool. Open its permissions. Don't show anyone your screen.

1. What is this app actually for?
2. What can it access?
3. Which access obviously makes sense?
4. Which access are you unsure it needs?
   What do you think they’re trying to do with the “additional data”

Compare categories, not private details.

3 MIN	alone — write
3 MIN	with the person beside you
THEN	one permission you question, per pair

USEFUL ≠ NECESSARY

Four questions, in this order. Don't start with “is this good or bad?”

PURPOSE
What exactly are we trying to do?

→

NEED
Does this data actually help do that?

→

LESS
Could we do it with less?

→

PERMISSION
Are we allowed to process it?

GDPR names: purpose limitation · necessity · data minimisation · lawful basis (Art. 5, 6, 9). Learn the reasoning, not the article numbers.

USEFUL ≠ NECESSARY



Quick test

I read a situation. You show a thumb. Then tell your partner why.



UP

Probably necessary



SIDEWAYS

We need more information



DOWN

Probably not necessary

"We don't know yet" is a professional answer.

Kabul · 2010

The US Gov is asking you to advise on a personnel and payroll system.

- Personnel rolls are inflated. “Ghost” employees and payroll fraud are documented problems.
- Nobody can reliably verify who a person is.
- ID cards and electronic payroll are being introduced to fix this.

Your job: a system that actually works — without more capability than the job needs.

No hindsight. Decide with what you know now.

Based on U.S. GAO reporting on Afghan police payroll and identity systems. GDPR is our analysis lens, not the law in Afghanistan in 2010.

Sort the data cards

No moving chairs. Person beside you = pair. Two neighbouring pairs = four.

MUST

We cannot do the job without it.

MAYBE

We need more information first.

NO

Useful, perhaps. Not necessary.

2 MIN · ALONE	Mark three cards: one MUST, one NO, one MAYBE.
5 MIN · PAIR	Tear/cut sort all the cards into three groups.
10 MIN · FOUR	Merge with the pair beside you. One sheet, one decision.

Rule: every MUST card needs a sentence that begins “We need this because…”

Sort the data needs

Useful ≠ necessary

Sort each card into MUST / MAYBE / NO.
For every MUST, be ready to explain why the stated purpose cannot be met without it.

PURPOSE What are we trying to do?	NEED Does this genuinely help?	LESS Could we achieve it with less?	PERMISSION Are we allowed?

Legal name	**Personnel ID**
Photograph	**Fingerprint**
Iris scan	**Rank + assigned unit**
Payment account / mobile money	**Home address**
Father's name	**Family / relatives**
Place of origin	**Phone number**
Date of birth	**Employment history**

Rule: every MUST card needs a sentence that begins "We need this because…"

Your manager writes…

"We're enrolling everyone anyway.
Let's also collect home address, relatives, place of origin and a second biometric. It might be useful later."

What is wrong with this sentence?

30 seconds alone, in writing → 60 seconds with your partner → one pair answers

Commit your design

COMMIT YOUR DESIGN

PURPOSE	We are trying to… _____ _
KEEP	We collect… _____ _
REFUSE / PAUSE	We do not collect… _____ _
MISSING	Before approving, we still need to know… _____ _
DECISION	Proceed · modify · postpone · refuse _____ _

11 years later August 2021 · the operator changes

The government falls.
Biometric and payroll systems built with international support come under Taliban control. How much they could access varied by system.

Look at what you built.
What can a different operator now know — or do?

ONE DESIGN CHOICE YOU WOULD CHANGE

collect less | separate the systems | limit who can search | delete sooner | keep it local

Historical reveal: Human Rights Watch, 2022. The lesson is not “predict the Taliban.” It is: notice the capability your design leaves behind.

Before you leave, email me bg@bilalghalib.com

Or give it to me on a piece of paper or hand it to me on your way out.

PURPOSE *Our system was for…*

ONE FIELD I CAN JUSTIFY *…because…*

ONE FIELD I WOULD CHALLENGE *…because…*

ONE THING I STILL NEED TO KNOW

HOMEWORK · 20 MINUTES

One service you use
. Its purpose
· the data it takes
· one item clearly necessary
· one you question
· one fact you'd need before deciding

Your recommendation in one sentence by next class

When someone says “this data would be useful”
Useful for what? Necessary for what?