

Press Release: No. 3/2022

Magdeburg, November 3, 2022

Language for data protection

The State Commissioner for Data Protection recommends that website operators

local integration of Google Fonts

The state representative for data protection has recently received repeated

Questions from website operators who, due to the integration of Google Fonts,

received warning letters from lawyers.

The background is a judgment of the Munich Regional Court of January 20, 2022 (Ref.: 3 O

17493/20), according to which a violation of the right to informational self-determination

and general personal rights when accessing a website

the dynamic IP address of the website user automatically and without consent

notification is forwarded to Google. The use of external font services

cannot be based on Art. 6 Para. 1 S.1 lit. f GDPR (legitimate interest)

den, since the use of the fonts is also possible without a connection to

external servers and a transmission of the IP address of the web

site user successes. With this judgement, the website user was awarded a

rate of €100 awarded.

Since the state commissioners only comment on data protection issues

legal advice regarding the question of how to deal with such

writing is not possible. Here can only on your own research or

refer to the advice of a lawyer.

"In order to integrate external fonts into websites in compliance with data protection regulations, I recommend

the website operators urgently not to download the fonts directly from the server of the respective

gene provider, but to download it first and locally on the

save own server. From there, the fonts can be exported in compliance with data protection regulations

The website can be integrated without connecting to external servers

will be set up,” said Albert Cohaus.

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Website operators often use content management to create their websites

ment systems such as e.g. WordPress. To be sure that the system used

does not include external fonts by default and without their knowledge, they can

their pages, among other things, with the help of the developer software contained in all web browsers

check tools for this.

The state commissioner advises against using external fonts for the integration

Servers require the consent of the website visitor in accordance with Article 6 Paragraph 1 Letter a of the GDPR

or Article 49 Paragraph 1 Clause 1 Letter a GDPR. For effective consent

would have to provide him with information in accordance with Art. 12, 13 DS-GVO for the

available to know to what extent consent is given. This

Information would also have to include the risks involved in third-country transfers.

In addition, a transmission to an insecure third country pursuant to Art. 49 Para. 1 Sentence

1 lit. a GDPR only for occasional transmissions. Unless on

a website loads fonts from external servers and integrates them,

so that each time the website is accessed, the IP address of the website visitor

transmitted to this server is based on a systematic, repetitive data

data processing can be assumed, so that consent pursuant to Article 49 (1) sentence 1 lit

GDPR is not possible.

Imprint:

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