

Avoid warnings about data protection violations on websites - integrate Google Fonts locally

In view of the mass warning letters due to the use of Google Fonts on websites, the Lower Saxony State Commissioner for Data Protection (LfD) calls on the operators of the websites to design them in accordance with data protection regulations. The LfD regularly receives complaints about the use of Google Fonts and requests for advice on warnings.

There are currently increasing reports of a wave of warnings against the use of Google Fonts on websites. This was triggered by a decision of the Munich Regional Court of January 20, 2022 (LG Munich I – 3 O 17493/20). In civil proceedings against the operator of a website, the court awarded the plaintiff 100 euros in damages for the use of Google Fonts in violation of data protection. Private individuals and law firms are now basing their letters to website operators on this judgment, demanding damages and reimbursement of legal fees. Furthermore, they require the addressees, among other things, to receive information about stored personal data and to delete this data.

The LfD Niedersachsen regularly receives requests for advice on this topic. However, the warnings and the claims asserted with them are civil law disputes for which the LfD is not responsible. It is therefore not allowed to provide individual advice in this context.

Various ways of integration

The US company Google Inc. offers fonts for the design of websites via Google Fonts. The service is used on many sites, but there are two different ways of technical integration. If Google Fonts is integrated online, the fonts are loaded from Google servers when the website is accessed and the user's personal data is automatically transmitted to Google Inc. in the USA. Alternatively, the Google fonts used on the website can be downloaded and stored locally on your own server. This is the variant that complies with data protection regulations and is therefore also recommended by the LfD Lower Saxony. However, many other providers also offer fonts for website design, which are compliant with data protection when integrated accordingly.

review of warning letters

Operators of websites who have received a warning letter because of Google Fonts should check the following:

Are you the provider and data protection officer of the website mentioned in the letter?

Is Google Fonts integrated on the website?

Is Google Fonts online integrated?

Is no effective consent obtained from users in accordance with Section 25 (1) TTDSG and Article 6 (1) (a) GDPR for the use of

Google Fonts?

If all of these questions are answered with "yes", there has been a data protection violation with regard to Google Fonts.

If you are responsible under data protection law for the website mentioned in the letter, you are also generally obliged to comply with the request for information.

When examining websites, the LfD Niedersachsen regularly finds violations of the law, in particular with regard to the integration of third-party services. Such a check is technically relatively simple and can be carried out by almost anyone.

Warning letters can only be safely avoided if the legal requirements of the Telecommunications Telemedia Data Protection Act and the General Data Protection Regulation are observed when designing websites. Site operators can find out how to do this, for example, in the German supervisory authorities' guide for providers of telemedia.

Further information

Data protection-compliant consents on websites - requirements for consent layers

General information for website operators

Press release as PDF download