

Bavarian State Office for

data protection supervision

Ansbach, October 18, 2018

press release

doorbell and data protection

Now that there is no longer just one Viennese housing association with its nonsensical

has published plans due to the General Data Protection Regulation (GDPR)

to remove signs from blocks of flats, but there are also such signs in Germany

there are aspirations, it is necessary to state clearly that there is a

such necessity does not exist for data protection reasons.

The names on bell signs are personal data. The General Data Protection Regulation applies to

“Fully or partially automated processing of personal data, as well as for the non-automated

Processing of personal data stored or to be stored in a file system

must”. Attaching bell signs is not automated processing. Even if you hardly

reasonable opinion should be reached that printed name badges of the residents from an automated

processing and the arrangement of the bell signs in the entrance area in a file system

tem takes place because it reflects the location of the apartment and thus leads to an application of the

General Data Protection Regulation would be processed by the housing association as a rule

according to Art. 6 Para. 1 f DS-GVO permissible under data protection law.

In individual cases it may be justified that the (correct) name of residents is not on the doorbell

stands. In the case of vulnerable celebrities, persons in a witness protection program or persons

threatened by stalking may justify a pseudonymised designation on the doorbell

to be A data protection requirement to pseudonymize all doorbells, that is, the

There is no such thing as replacing names with other identifiers such as numbers or combinations of letters.

Under civil law, i.e. by house rules or other contract, the whether and how (e.g. uniform

appearance) of the doorbells can be regulated. It can then also be taken into account whether

make it difficult for postal service providers, rescue services and other visitors to find residents

would like.

"I find it very problematic and also a great pity that these nonsensical claims have caused the very good

General Data Protection Regulation is used as a justification for something that it doesn't even ask for and they

thus being discredited as "unworldly European law". Expressions of the kind that a tenant only applies to

had to complain to the supervisory authority if his doorbell was not removed and the supervisory authority

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will then impose a fine of EUR 20 million, which is legally completely out of the question, shows that this is about

scaremongering or striving for media presence, but in any case not about real data protection," says Thomas

Kranig, President of the Bavarian State Office for Data Protection Supervision.

Thomas Kranig

president