

Collaborative Discussion 3 – Initial Post – Michael Geiger

The case study of “The Dublin Mint Office Limited” demonstrates that the collection and use of personal information should be done with care.

The Dublin Mint Office Limited is an e-commerce platform selling precious metal products such as gold coins, bars and rings. For this purpose, the company collects personal data for the delivery, but also for advertising purposes. The company states that information is processed which are provided by the users themselves, but also that which arises from the use of the website. The provider collects user information such as location information, telephone numbers, IP addresses, usage prevalence in relation to the website and information about the devices used to access the website and stores it for six years (The Dublin Mint Office Limited, 2021).

In DPC's 2018 case study, a customer complained of being repeatedly called by the company to make sales. The customer previously created two user accounts for himself and his son and provided the same phone number in both cases (Data Protection Commission, 2018). When registering, there was a confirmation field for using the mail and e-mail addresses for advertising purposes, but none for such use of the telephone number. Therefore, it was not possible to opt out of advertising over the phone.

Due to data collection as well as usage, some standards of the GDPR need to be examined. It can be determined that the company in the specific case did not comply with Art. 5.1.a and Art.5.1.b, since there was no transparency of the use or its earmarking (DGPR, 2022).

Furthermore, in this context it can be questioned whether Art.5.1.c, the standard of data minimization, is not also affected in a certain form, since a customer's telephone number is not necessary to process a purchase and in the context of the case study of the DPC was automatically used for advertising purposes. Also in view of the current privacy policy, it should be questioned whether the data collected is really necessary on the part of the company, since the possession of this data goes hand in hand with a responsibility to the same extent.

References:

Data Protection Commission (2018) Case Study 3: The Dublin Mint Office Limited. Available from: <https://www.dataprotection.ie/en/pre-gdpr/case-studies#201803> [Accessed: 20.01.2022]

GDPR (2022) Principles relating to processing of personal data. Available from: <https://gdpr.eu/article-5-how-to-process-personal-data/> [Accessed: 20.01.2022]

The Dublin Mint Office (2021) Privacy Policy. Available from: <https://www.dublinmintoffice.ie/customer-service/privacy> [Accessed: 20.01.2022]