

# Exercise 1 - Privacy and Data Protection

## 1. Valid Consent?

Here is the link to the “Personal Data” section of Adlibris, an online bookstore where I have an account: <https://www.adlibris.com/fi/sv/kundtjanst/personuppgifter>

The Data Policy of Adlibris **mostly** complies with the new requirements and conditions set by the GDPR. A few examples:

### **Art 5 (1) a) GDPR:**

The data in Adlibris is processed lawfully, fairly and in a transparent manner. The policies for collecting and handling personal data are easy to find in the Adlibris website and have been set up in a way that makes it easy to browse/read them and find all the details (table of contents with links).

### **Art 5 (1) b) GDPR:**

The data is collected for specified, explicit and legitimate purposes in Adlibris’ “Personal Data” subsection “how we use personal data”. The purposes are itemised and very clear.

### **Art 5 (1) f) GDPR:**

There is appropriate security of the personal data as seen in the subsection “security of your personal data”.

### **Art 6 (1) a) GDPR and Art 7 (1) GDPR:**

Adlibris only processes data after the user has specifically agreed to their data collection and processing terms.

### **Art 7 (3) GDPR:**

Adlibris’ subsection on “your individual rights” specifies that the data subject shall have the right to withdraw his or her consent at any time.

### **Art 7 (3) GDPR – Violation!!!:**

The GDR says “It shall be as easy to withdraw as to give consent.”. Consent is given with ticking a box and setting up your account is done within a few minutes. For withdrawing consent, you need to contact customer services and, as their subsection on “your individual rights” says, “The actions you requested are performed within a reasonable time which depending on the circumstances can be up to 3 months”.

## 2. Your Right to Access your Personal Data

You have the right to know if personal data about you is processed by a controller. You also have the right to get access to, for example, the processing purposes, the data categories, data transfers, and duration of storage.

Find the relevant parts in GDPR and study your rights as a “data subject”.

File a right to access -request with a data processing service of your choosing. Describe the mechanism that is put in place by the service to enable you to exercise this right (if any).

Whether you get a response or not, think about how well your rights as a data subject are respected in practice. Your answer should again refer to specific articles and paragraphs of the GDPR.

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### **Art 12 (2) GDPR:**

It was quite easy to request an excerpt of my data with Adlibris. They specify your rights regarding your personal data and have a dedicated email for data-related requests. I had to use the email address which is connected to my account with them and mentioned my customer number. I am still waiting for an answer but legally they have a month for complying with my request.

## 3. Anonymisation & Pseudonymisation

What is the difference between anonymisation and pseudonymisation of personal data?

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In anonymisation, all information that can be used to identify the person to whom the information pertains is removed.

In pseudonymisation the identifying information is still there and has not been removed, but it gets somewhat changed (e.g., via an encryption scheme) so that it is difficult to link a set of data with a specific individual.