# Introduction

The Dublin Mint Office targeted individuals to sell commemorative coins, although the customers declined to opt for any marketing promotion while online registration.

# Issue Breakdown

“The company explained that a gap in the system in place at the time only allowed for an opt-in to marketing mails and emails but that it was not an opt-out for telesales. As a result, the complainant’s details were included in a list for a follow-up telesales call. The company informed the DPC that it had written to the complainant to apologise for the inconvenience caused to him and to his son by its inadvertent mistake.” (Data Protection Commission, 2018)

GDPR violations:

* Art. 6 GDPR Lawfulness of processing (Intersoft Consulting, N.D.a)
  + Absence of controller to filter user private data.
* Art. 7 GDPR Conditions for consent (Intersoft Consulting, N.D.b)
  + The user consent for telemarketing was not designed in the system.
  + The consent of the user has been ignored deliberately.
* Art. 21 GDPR Right to object(Intersoft Consulting, N.D.c)
  + The personal data of the user had been used without offering the right to object.

The company preceded with similar mal-practice with multiple customers leading to legal cases where the company had been charged guilty on two charges and had to pay a fine.

# Other Loopholes

Apart from the loophole mentioned by the organization, it is evident there has been

* Absence of data controller
* Absence of audit
* System design flaw

# Security Challenges

The possible threats if the data are exposed

* PII Data which can be utilized for identity theft
* Frauds

# References

Intersoft Consulting. (N.D.a) Art. 6 GDPR Lawfulness of processing. Available From: <https://gdpr-info.eu/art-6-gdpr/> [Accessed 20 July 2021].

Intersoft Consulting. (N.D.b) Art. 7 GDPR Conditions for consent. Available From: <https://gdpr-info.eu/art-7-gdpr/> [Accessed 20 July 2021].

Intersoft Consulting. (N.D.c) Art. 21 GDPR Right to object. Available From: <https://gdpr-info.eu/art-21-gdpr/> [Accessed 20 July 2021].

Data Protection Commission (2018) Case Studies. Case 3 of 2018 "The Dublin Mint Office Limited". Available from: <https://dataprotection.ie/en/pre-gdpr/case-studies> [Accessed 20 July 2021].