

Hi Gregor,

Thank you for your message. We have received your data subject request re. Art 15, 18 and 21 GDPR.

After consulting with our legal team, we can provide you with the following response to your enquiry:

We understand your request in relation to Art. 15 GDPR is limited to "the purpose, citing a valid legal basis under GDPR Article 6, for processing my personal data" in relation to the mentioned forms.

However, we have severe concerns about the justification of any of your data subject requests, because you have written on behalf of the University of Tartu, which indicates that not you as a data subject is making the request, but you on behalf of the University (for maybe research purposes?). If this is the case, the request would be considered an abuse of rights. Besides, is the University aware you make these requests on their behalf? If not, this might have severe consequences (possibly also from a criminal law perspective).

Nevertheless, please note as a general remark (which suffices from our perspective to answer your limited request re. Art. 15 GDPR), that the purpose for the processing of personal data via the "Password Reset Form", the Account Registration Form" and "Email Change Form", is to enable customers to use these functions in a user-friendly manner. This current set-up shall facilitate that customers can detect if they made any typing errors or used a wrong email address. The approach suggested by you would result in severely less user-friendliness, leaving many customers frustrated and partly result in users not being able to access their account again at all.

Due to this, the legal bases are Art. 6 (1) (b) and Art. 6 (1) (f) GDPR. It is necessary to provide customers as part of the contractual relationship with the above-mentioned functions. Besides, the specific form of providing the above-mentioned functions is also based on legitimate interests. The balancing of interests clearly supports the processing as is. The current set up results in much more user-friendliness and prevents customers indirectly blocking from using our services. Besides, there is not much risk

related to this approach. The information that someone is a customer of a shopping website is not sensitive at all.

Also in real life one knows many services other people use, e.g. who else is a member of your gym (including their name, by which one can easily find out their address). There is no difference, because also in relation to email addresses one could only try to enter these, if he/she would initially know that email address - which is a sufficient threshold for any misuse in first step.

The legal sources provided by you to support your argument are not suitable at all. Besides, also your logical argument is not convincing. The information "Uh oh, something went wrong" does not give any information to someone who does not have an account and it can thus not be construed what this means, i.e. whether there is no account, there is a typing error, etc. The other way around, also the information that an email has been sent does not necessarily mean that the email address actually is connected to an account or whether this is just a standard information, even if the email address does not exist or is mistyped.

Based on that, the other data subject rights in form of Art. 18 and 21 GDPR are in any case not justified. If you do not want your personal data to be processed via the forms as described, we recommend you delete your account.

Please note that we are considering contacting the University Tartu to verify whether they are aware you are acting in their name.

Best regards

Nils Perucca