

Exercise 1

Application Introduction

1. Valid Consent?

2. Right to Access

3. Anonymisation & Pseudonymisation

Application Introduction

Proton provides services including email, VPN, calendar, cloud storage and so on.

<https://proton.me/legal/privacy>

I check its privacy policy here.

1. Valid Consent?

Art 6.1(a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes;

Proton clearly states that certain processing activities, such as using the email for notifications, security alerts, or promotional messages, are based on user consent. Users can opt in or out of these communications.

Art 7.3 The data subject shall have the right to withdraw his or her consent at any time.

²The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. ³Prior to giving consent, the data subject shall be informed thereof.

⁴It shall be as easy to withdraw as to give consent.

Proton allows users to modify or withdraw consent at any time through the account settings.

Art 7.1 Where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data.

Proton maintains records of user preferences and settings to demonstrate whether consent was given.

Overall, Proton's consent mechanism is clear, specific, and fully aligned with GDPR requirements. Users are informed about the purposes of data processing, can freely give or withdraw consent, and the system records their preferences to demonstrate compliance. This approach ensures transparency, user control, and accountability, which are key principles under GDPR.

2. Right to Access

Art 15.1

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a. the purposes of the processing;
- b. the categories of personal data concerned;
- c. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f. the right to lodge a complaint with a supervisory authority;
- g. where the personal data are not collected from the data subject, any available information as to their source;
- h. the existence of automated decision-making, including profiling, referred to in [Article 22](#)(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Through your Account interface, you can directly access, edit, delete, or export personal data processed by the Company in your use of the Services.

Art 12.1 The controller shall take appropriate measures to provide any information referred to in [Articles 13 and 14](#) and any communication under [Articles 15 to 22 and 34](#) relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child. ²The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. ³When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

Proton's dashboard provides a self-service interface where users can download or manage their data directly, making the access process transparent and convenient.

Proton provides a convenient and self-service interface for users to access, edit, delete, or export their personal data. The access mechanism is transparent and timely, demonstrating practical compliance with GDPR. Even when additional support is needed (e.g., suspended accounts), the service maintains responsiveness. Overall, Proton respects data subjects' rights effectively.

3. Anonymisation & Pseudonymisation

Recital 26

The principles of data protection should apply to any information concerning an identified or identifiable natural person. ²Personal data which have undergone pseudonymisation, which could be attributed to a natural person by the use of additional information should be considered to be information on an identifiable natural person. ³To determine whether a natural person is identifiable, account should be taken of all the means reasonably likely to be used, such as singling out, either by the controller or by another person to identify the natural person directly or indirectly. ⁴To ascertain whether means are reasonably likely to be used to identify the natural person, account should be taken of all objective factors, such as the costs of and the amount of time required for identification, taking into consideration the available technology at the time of the processing and technological developments. ⁵The principles of data protection should therefore not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable. ⁶This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes.

Anonymisation: Data is processed so that it cannot be traced back to an individual in any way.

Art 4.5 Pseudonymisation means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure non-attribution to an identified or identifiable person.

Pseudonymisation: Data is replaced with identifiers, which prevent direct identification but can be linked back if extra information is used.

Proton implements both anonymisation and pseudonymisation appropriately to enhance user privacy. Web analytics are anonymised to prevent identification, and verification data is pseudonymised using cryptographic hashes. These practices reduce the risk of personal data exposure while still allowing necessary operational processing. Overall, Proton demonstrates a strong commitment to GDPR-compliant privacy safeguards.