



# What is the Internet doing to me? (Security and **privacy** for people in a connected world)

Some legal issues

Class 2; 10 October 2023

DSARs, RtbF Requests, etc **for Assessments**

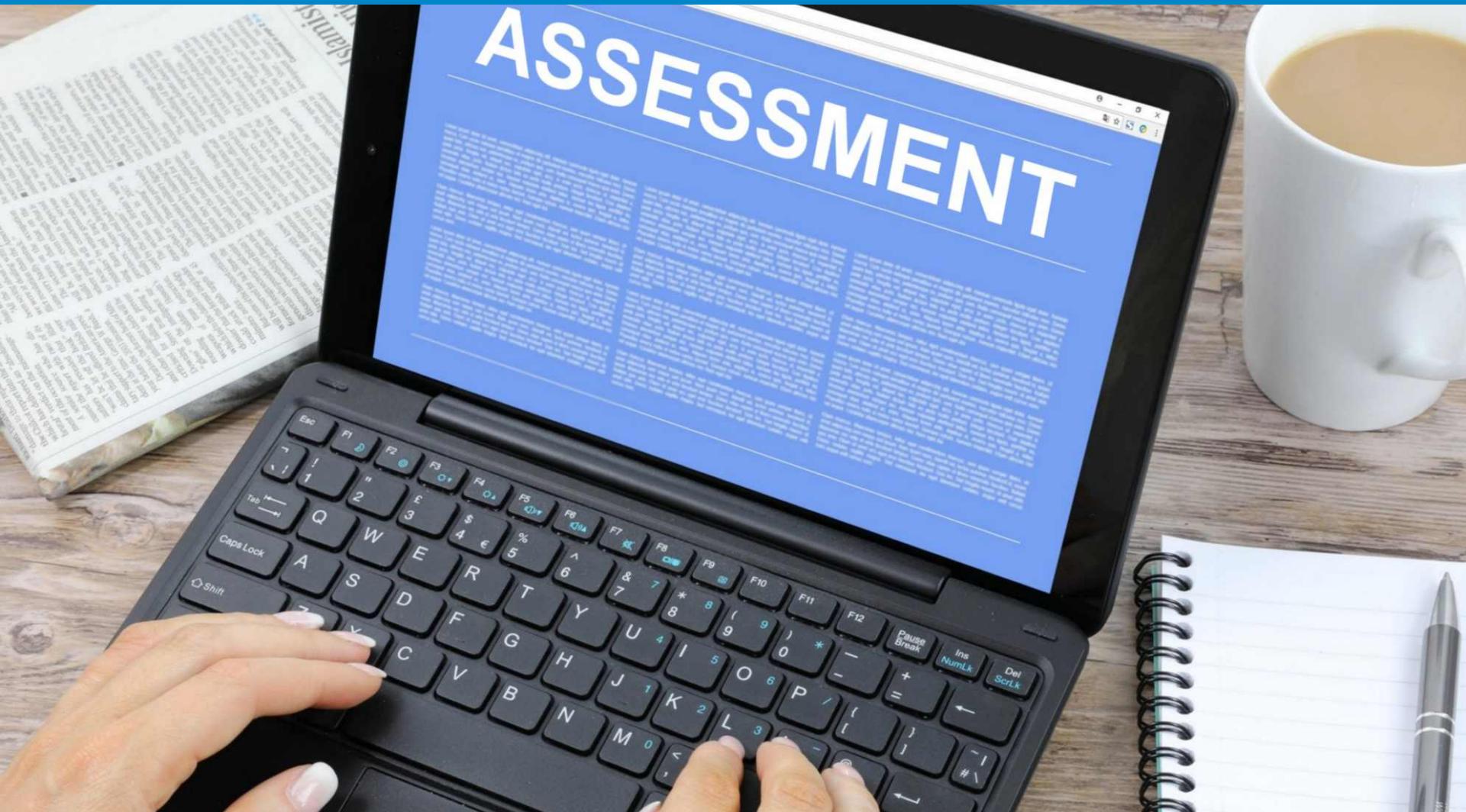
Dr Eoin O'Dell

@cearta

# Hello



# GDPR Data Subject Rights



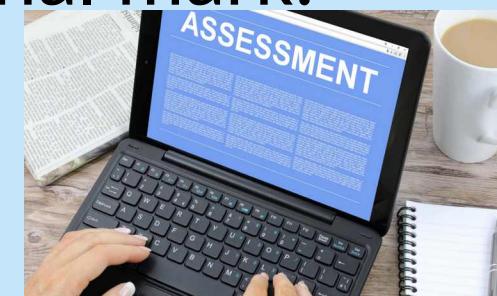
# Assessment

Please do a GDPR data subject access request or a right to be forgotten/erasure request.

Choose your target service via the link on Blackboard. We would very much like some diversity in terms of service providers, so please don't all choose the obvious one(s).

This assessment is worth **25%** of your final mark.

Submit via Blackboard on or before **Thu 30 Nov 2023** (anytime on Earth).



# GDPR Data Subject Rights



## The Right to Access

Individuals have the right to access any personal data that has been collected about them

**Art 15 (&19)**



## The Right to Be Forgotten

Individuals have the right to have their personal data deleted and to prevent further collection

**Art 17 (&19)**

# GDPR Data Subject Rights



## **The Right to Access**

Individuals have the right to access any personal data that has been collected about them

## **Art 15 (&19)**

# Data Subject Access Request



# Article 15 GDPR

## *Right of access by the data subject*

- (1) The data subject shall have the right to obtain from the controller



# Article 15 GDPR

## *Right of access by the data subject*

- (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,



# Article 15 GDPR

## *Right of access by the data subject*

(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 [data subject's] **personal data**



# Article 15 GDPR

## *Right of access by the data subject*

(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 [data subject's] **personal data**[,] **and** the following information:



# Article 15 GDPR

## *Right of access by the data subject*

- (a) **purposes** of processing;
- (b) **categories** of personal data;
- (c) **recipients** of the data;
- (d) **period** of storage; ...
- (g) information as to the **source** of the data;
- (h) the existence of **automated decision-making**, including **profiling**



# Article 15 GDPR

## *Right of access by the data subject*

- (1) The data subject shall have the right to obtain from the controller ... the following information:
- (e) the existence of the right to request from the controller **rectification or erasure** of personal data or **restriction** of processing ... or to **object**;
- (f) the right to **lodge a complaint**.



# Article 15 GDPR

## *Right of access by the data subject*

- (3) The controller **shall provide** a copy of the personal data undergoing processing.



# Article 15 GDPR

## *Right of access by the data subject*

(3) The controller **shall provide** a copy of the **personal data** undergoing processing. ... Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided **in a commonly used electronic form.**



# Section 91 Data Protection Act 2018

## *Right of access*

- (1) [sets out Article 15 GDPR]
- (2) Respond ASAP, within **one month**;



# Section 91 Data Protection Act 2018

## *Right of access*

- (1) [sets out Article 15 GDPR]
- (2) Respond ASAP, within **one month**;
  
- (5)&(6) In complex cases, may add up to two more months.



# Section 91 Data Protection Act 2018

## *Right of access*

(3) ... the individual making the request shall provide the controller with such information as the controller **may reasonably require** to satisfy itself of the identity of the individual and to locate any relevant personal data or information.



# Who is this?



# How to make a data subject access request



Adam Ant

*Stand and Deliver*

# How to make a data subject access request

CONTACT US

PRE-GDPR

GAEILGE

ENGLISH

Search



An Coimisiún um  
Chosaint Sonrái  
Data Protection  
Commission

YOUR  
DATA

FOR  
ORGANISATIONS

RESOURCES

WHO WE  
ARE

NEWS AND  
MEDIA

DATA PROTECTION  
OFFICERS

## Your Data

+ Data Protection:  
The Basics

- Your rights under  
the GDPR

Access

To be informed

Rectification

Erasure

Data Portability

Automated Processing

Right to object to  
processing

Restricted processing

Restriction of rights

[Home](#) » [Your Data](#) » [Your Rights under the GDPR](#)

## The Right of Access

(Article 15, Recitals 63 & 64 GDPR)

The General Data Protection Regulation (GDPR), under Article 15, gives individuals the right to request a copy of any of their personal data which are being 'processed' (i.e. used in any way) by 'controllers' (i.e. those who decide how and why data are processed), as well as other relevant information (as detailed below). These requests are often referred to as 'data subject access requests', or 'access requests'.

## What is the right of access?

There are actually a few different aspects to the right of access under Article 15 GDPR, including certain information, and a copy of your personal data. You have the right to obtain the following from the data controller:

# How to make a data subject access request

CONTACT US

PRE-GDPR

GAEILGE

ENGLISH

Search



An Coimisiún um  
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Restriction of rights

[Home](#) » [Your Data](#) » [Your Rights under the GDPR](#)

## How do I exercise the right of access?

The GDPR does not set out any particular method for making a valid access request, therefore a request may be made by an individual in writing or verbally. The DPC would, however, encourage individuals to submit written access requests where practical, to avoid disputes over the details, extent, or timing of an access request. The DPC has provided the below template for access requests that are made to the controller in writing:

Dear...

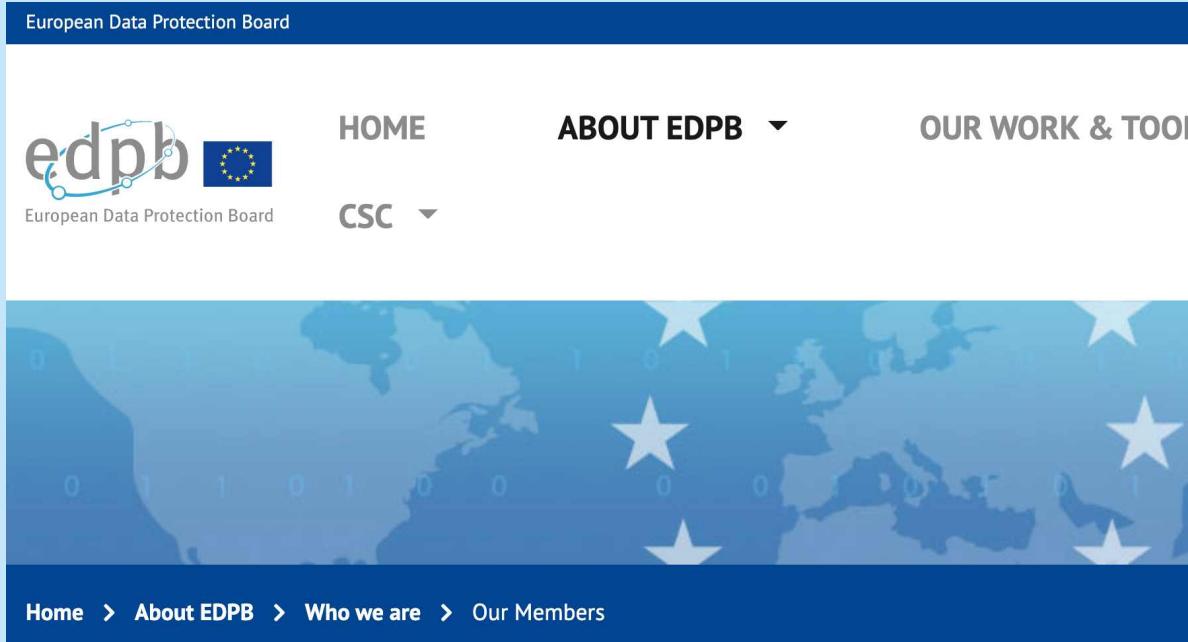
I wish to make an access request under Article 15 of the General Data Protection Regulation (GDPR) for a copy of any information you keep about me, on computer or in manual form in relation to...

# Other DPAs

European Data Protection Board

**edpb** European Data Protection Board

HOME ABOUT EDPB ▾ OUR WORK & TOOLS  
CSC ▾



Home > About EDPB > Who we are > Our Members

## Our Members

The EDPB is composed of representatives of the EU national data protection authorities, and the European Data Protection Supervisor (EDPS).



# GDPR Data Subject Rights



## The Right to Be Forgotten

Individuals have the right to have their personal data deleted and to prevent further collection

**Art 17 (&19)**

# Who is this?



# The search that started it all

Mario Costeja Gonzalez

Web Imágenes Vídeos Noticias Shopping Más Herramientas

Aproximadamente 72.400 resultados (0,45 segundos)

**Noticias sobre Mario Costeja Gonzalez**

«Yo nunca he defendido el derecho al olvido en Internet»  
La Voz de Galicia - hace 23 horas  
Mario Costeja González: «Yo nunca he defendido el derecho al ... ha dado la razón a Mario Costeja en un contencioso que lo enfrentó al ...

Más noticias sobre Mario Costeja Gonzalez

**Edición del lunes, 19 enero 1998, página 23 - Hemeroteca ...**  
[hemeroteca.lavanguardia.com/preview/1998/01/19/pagina.../pdf.html](http://hemeroteca.lavanguardia.com/preview/1998/01/19/pagina.../pdf.html) ▾  
19/1/1998 - Previsualiza el ejemplar de La Vanguardia - Hemeroteca - Lavanguardia.es.

**Mario Costeja: "Google era una gran herramienta y ahora ...**  
[www.lavanguardia.com/.../mario-costeja-google-era-una-gran-herramien...](http://www.lavanguardia.com/.../mario-costeja-google-era-una-gran-herramien...) ▾  
hace 3 días - El español Mario Costeja, que ha logrado que el Tribunal de Justicia de ... y a Google con un ciudadano español, Mario Costeja González, que ...

# The search that started it all

LUNES, 19 ENERO 1998

## SOCIEDAD

**Ciudadanos**: La polémica sobre la eutanasia tras la muerte de Sampredo

### El Parlamento negó la eutanasia en el debate del Código Penal

■ El PP solicitó que se equiparara al homicidio; IU-IC, la despenalización, y el PSOE, mayoritario, optó por una postura intermedia, manteniendo la ilegalidad pero con penas amparadoras



ACN/EP

El tetrapléjico Ramón Sampredo fotografiado en su domicilio en 1994

E

FRANCESC PERIRÓN  
■ BARCELONA. — El reciente nacimiento de Ramón Sampredo, que en 1993 se convirtió en el primer paciente tetrapléjico en ser sometido a la eutanasia voluntaria, ha abierto una polémica que se reconoce el derecho a una muerte digna ha reavivado el debate sobre la eutanasia. Los tres partidos que parecen recordar que hace casi dos años en el Congreso la Cuestión, durante la tramitación y aprobación del nuevo Código Penal. Gana la postura mayoritaria, la del PSOE,

## OPINIÓN

Que la lucha de Sampredo no deba repetirse

■ CON OCASIÓN DE la muerte de Ramón Sampredo, la Asociación Derecho a Morir Dignamente (DDM) se pronuncia, una vez más, a favor del derecho a decidir cómo y en qué momento acceder a la propia muerte. Algunos argumentan que se le reconoce el derecho a una muerte digna, ha revisado el código penal. Otros dicen que los tres partidos que parecen recordar que hace casi dos años en el Congreso la Cuestión, durante la tramitación y aprobación del nuevo Código Penal. Gana la postura mayoritaria, la del PSOE,

que aboga por una amparadora de la pena, pero no por la despenalización. Algunos argumentan que se le reconoce el derecho a una muerte digna, ha revisado el código penal. Otros dicen que hace casi dos años en el Congreso la Cuestión, durante la tramitación y aprobación del nuevo Código Penal. Gana la postura mayoritaria, la del PSOE,

■ SALVADOR PÁNICKER

SI QUIERES mejorar tu vida sexual, PUEDES! MÁS TIEMPOS ENTRE LOS MEDIOS SEPARADOS LÓGAR Y TIEMPO PARA UNA ERECCIÓN IMPOTENCIA EVAUCACIÓN PREOCÉZ CONFÍATE, SÉ UN HOMBRE. INFORMACIÓN TÉCNICA DE MEDICINA CENTRO DE ESTUDIOS FINANCIEROS C/ Gracia, 171, 08003 BARCELONA Tel.: (93) 415 09 88

**MASTERS**  
El CEF presenta su oferta formativa para el año 1998 con el desarrollo de:  
● Master en Dirección Económico-Financiera  
● Master en Tributación/Asesoría Fiscal  
● Master en Gestión de Recursos Humanos  
● Master en Prácticas Jurídicas y Procedimiento  
Homologado por el Consejo General de los Notarios y los Recursos Humanos  
● Master en Prevención de Riesgos Laborales  
Homologado por la Generalitat/Comisión de Madrid

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Homologado por la Generalitat/Comisión de Madrid

LA VANGUARDIA 23

## SUBASTA D'IMMOBLES

La Direcció Provincial de la Seguretat Social a Barcelona, anuncia la subasta dels immobles que a continuació s'indiquen. Les condicions que han de regir l'allotjament, així com les dades de contacte per a la inscripció en la llista d'espera i els respectius Units de Recaudació Executiva fins al dia 28 de gener.

UR. 06/03 (BARCELONA) Tel. 314 45 14  
■ Meitat indivisa d'un local comercial al carrer Doctor Tristà, 139, propietat de MANUEL PUERTO BARBERÀ. Superficie: 14 m<sup>2</sup>. Càrregues: 3,0 millions de pts. Tipus de subhasta: 1,9 millions de pts.

UR. 06/10 (BARCELONA) Tel. 418 74 22  
■ Habitació a l'avinyuda de la República Argentina, 2, propietat de JOAQUÍN MELIÁ GARCÍA. Superficie: 34 m<sup>2</sup>. Càrregues: 5,6 millions de pts. Tipus de subhasta: 5,6 millions de pts.

UR. 06/11 (BADALONA) Tel. 389 55 54  
■ Habitació al carrer Rambles, 21, Sant Adrià de Besòs, propietat de M. ELIAS GONZALEZ GONZALEZ. Superficie: 73 m<sup>2</sup>. Càrregues: 5,9 millions de pts. Tipus de subhasta: 5,9 millions de pts.

UR. 06/12 (ORELLA) Tel. 822 74 22  
■ Dosa naus industrials i un habitatge al carrer Puig-Reig (Cal Casas), propietat de S.A. INDUSTRIAS DEL ALIRE COMPRESOR DO. Superficie: 1.400 m<sup>2</sup>. Càrregues: 1,2 millions de pts. Tipus de subhasta: 1.2 millions de pts.

■ Habitació a l'avinyuda de la República Argentina, 2, propietat de M. ELIAS GONZALEZ GONZALEZ. Superficie: 68 m<sup>2</sup>. Càrregues: 5,3 millions de pts. Tipus de subhasta: 5,3 millions de pts.

UR. 06/13 (CORNELLÀ) Tel. 873 64 42  
■ Edifici destinat a centre d'ensenyament al carrer Pintor Fortuny, 44, de Sant Boi de Llobregat, propietat de JORDI GONZALEZ ACCIO. Superficie: 1.400 m<sup>2</sup>. Càrregues: 1,2 millions de pts. Tipus de subhasta: 1.2 millions de pts.

■ Una quart part indivisa d'un solar amb edificació al carrer Migdia, de Vilanova i la Geltrú, propietat de JORDI GONZALEZ COLET. Superficie: 1.000 m<sup>2</sup>. Càrregues: 1.2 millions de pts. Tipus de subhasta: 1.2 millions de pts.

UR. 06/17 (MANRESA) Tel. 873 64 04  
■ Local comercial (entresol) al carrer Guimerà, 10, de Sant Joan de Vilatorrada, propietat d'EMSA GAS CALOR ACCIO. Superficie: 1.300 m<sup>2</sup>. Càrregues: 1,2 millions de pts. Tipus de subhasta: 1,2 millions de pts.

■ Meitat indivisa d'un habitatge al carrer Joan Bal, 15, de Saltent, propietat de PANTONIO GARCIA HERREIRA. Superficie: 49 m<sup>2</sup>. Càrregues: 4,7 millions de pts. Tipus de subhasta: 3,6 millions de pts.

UR. 06/18 (MATARÓ) Tel. 799 69 11  
■ Meitat indivisa d'un habitatge al carrer Mossèn Jaume Sala, 39 de Mataró, propietat de FERNANDO CANO MOYA. Superficie: 63 m<sup>2</sup>. Càrregues: 1,2 millions de pts. Tipus de subhasta: 1,2 millions de pts.

UR. 06/20 (SANT FELIU DE LLOBREGAT) Tel. 666 56 12  
■ Meitat indivisa d'un solar al carrer Baix, 55, d'Esparreguera, propietat de JUAN ANTONIO COCA MAGALLANES. Superficie: 160 m<sup>2</sup>. Càrregues: 1,2 millions de pts. Tipus de subhasta: 1,2 millions de pts.

■ Les dues meitats indivises d'un habitatge al carrer Montseny, 8, propietat de MARIO COSTEJA GONZALEZ i ALICIA VARGAS COTS. Superficie: 90 m<sup>2</sup>. Càrregues: 8,5 millions de pts. Tipus de subhasta: 2 millions de pts, cadauna de les meitats.

la Ute. Mrs. En Gall d'Esparreguera, propietat d'ALFREDO FERNANDEZ FERNANDEZ. Superficie: (total): 137 m<sup>2</sup>. Càrregues: 6,2 millions de pts. Tipus de subhasta: 2,3 millions de pts.

UR. 06/23 (VILAFRAMA DEL PENEDÈS) Tel. 871 19 79  
■ Dosa naus industrials i un habitatge al Carrer de la Font, 11, de la Ute. Plana de les Terres de Torrelles de Foix, propietat de JUAN ANTONIO ALBA VILLALON. Superficie (total): 1.430 m<sup>2</sup>. Càrregues: 1,2 millions de pts. Tipus de subhasta: 1,2 millions de pts.

■ Soler al nucli de Constantí, del terme de Subirats, propietat de JOSÉ CONDÍS ROIG. Superficie: 149 m<sup>2</sup>. Càrregues: cens segons inscripció registral. Tipus de subhasta: 2,4 millions de pts.

■ Soler al nucli de Constantí, del terme de Subirats, propietat de JUAN A. UREÑA CASTILLO. Superficie: 162 m<sup>2</sup>. Càrregues: 2 millions de pts. Tipus de subhasta: 3,8 millions de pts.

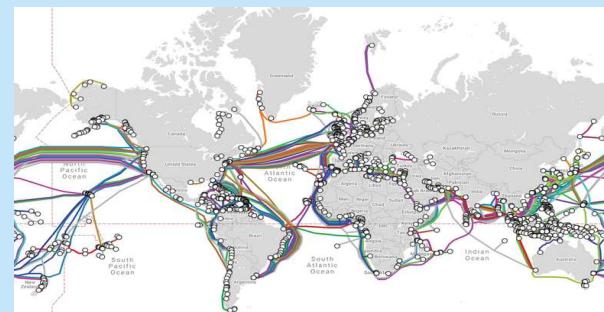
Podre obtenir informació més detallada mitjançant trensa telefònica als números de les Unitats indicades en aquest anuncis.

MINISTERIO DE TRABAJO Y ASUNTOS SOCIALES  
SECRETARÍA DE ESTADO DE LA SEGURIDAD SOCIAL  
TRESORERÍA GENERAL DE LA SEGURIDAD SOCIAL  
DIRECCIÓN PROVINCIAL DE BARCELONA

The two halves of an undivided dwelling, 8 Montseny Street, property of MARIO COSTEJA GONZÁLEZ and ALICIA VARGAS COTS, respectively. Area: 90 m<sup>2</sup>. Debt: 50,000 euro. Type of auction: 12,000 euro for each of the halves.

■ Les dues meitats indivises d'un habitatge al carrer Montseny, 8, propietat de MARIO COSTEJA GONZÁLEZ i ALICIA VARGAS COTS, respectivament. Superficie: 90 m<sup>2</sup>. Càrregues: 8,5 milions de pts. Tipus de subhasta: 2 milions de pts. cadascuna de les meitats.

# Case C-131/12 *Google Spain v AEPD & González*



# Case C-131/12 *Google Spain v AEPD & González*

The operator of a search engine is obliged to **remove from the list of results** displayed, following a search made on the basis of a person's name, links to web pages, published by third parties and containing information relating to that person that is **inadequate**, **irrelevant** or no longer relevant, or **excessive** in relation to the purposes of the processing.

# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*

(1) The data subject shall have the right to obtain from the controller the **erasure** of personal data concerning him or her **without undue delay**



# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*

(1) The data subject shall have the right to obtain from the controller the **erasure** of personal data concerning him or her **without undue delay**[,] and the controller shall have the obligation to erase personal data without undue delay



# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*

(1) The data subject shall have the right to obtain from the controller the **erasure** of personal data concerning him or her **without undue delay**[,] and the controller shall have the obligation to erase personal data without undue delay[,] where one of the following grounds applies:



# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*

- (a) no longer necessary;
- (b) withdraws consent;
- (c) objects;
- (d) unlawful processing.



# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*

(3) Para (1) shall not apply to the extent that processing is **necessary** [for]:

(a) freedom of expression;

...

(c) reasons of public interest in the area of public health;

(d) research;

...



# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*



### EU Privacy Removal

#### Personal Information Removal Request Form

For privacy reasons, you may have the right to ask for certain personal information relating to you to be removed.

This form is for requesting the removal of specific results for queries that include your name from Google Search.

# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*



**EU** The URL(s) for the content containing the personal information you want removed \*

Click [here](#) for help with finding the URL.

Pe

For

This

removed.

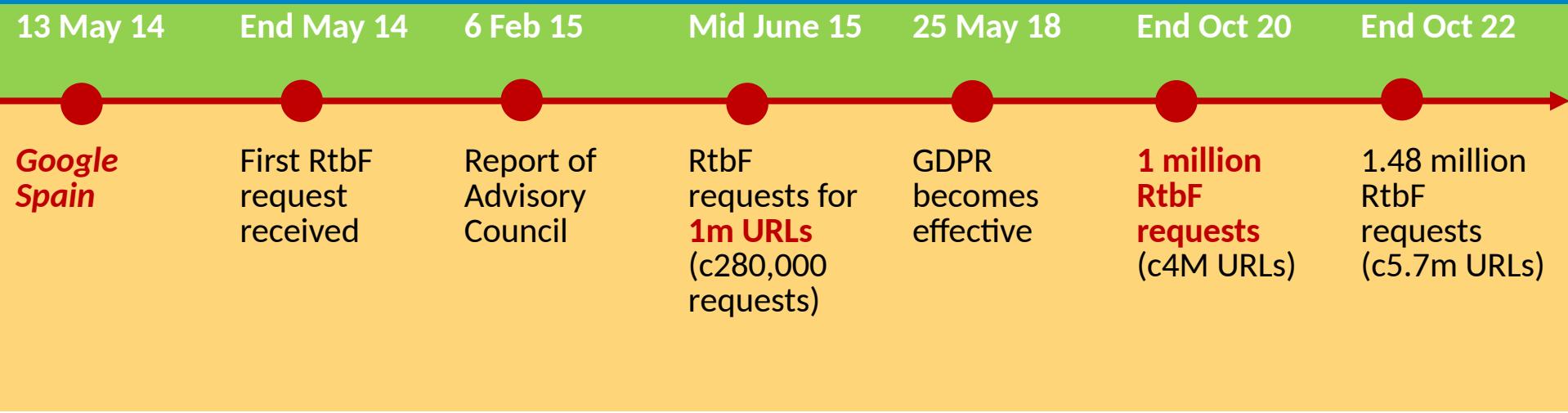
le Search.

Please enter one URL per line (Max 1000 lines)

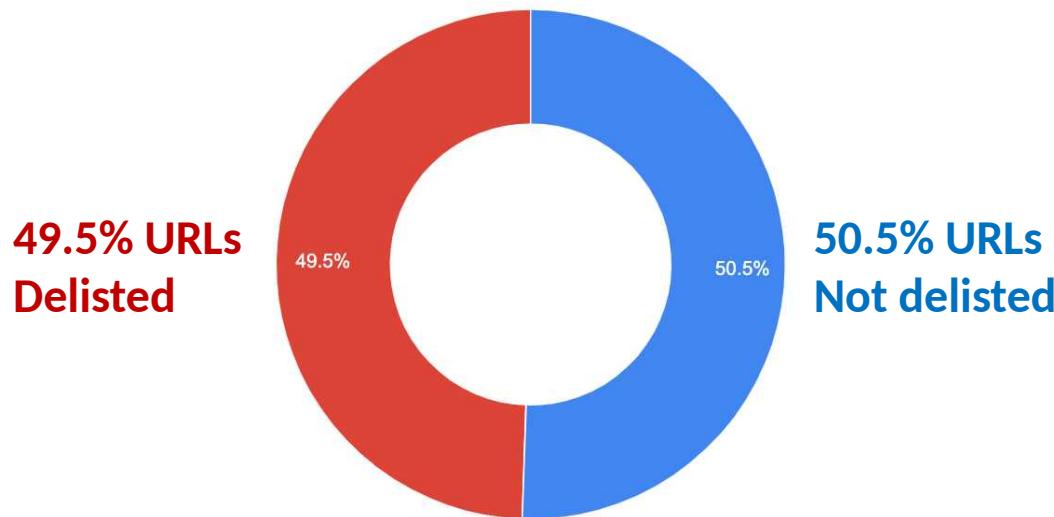
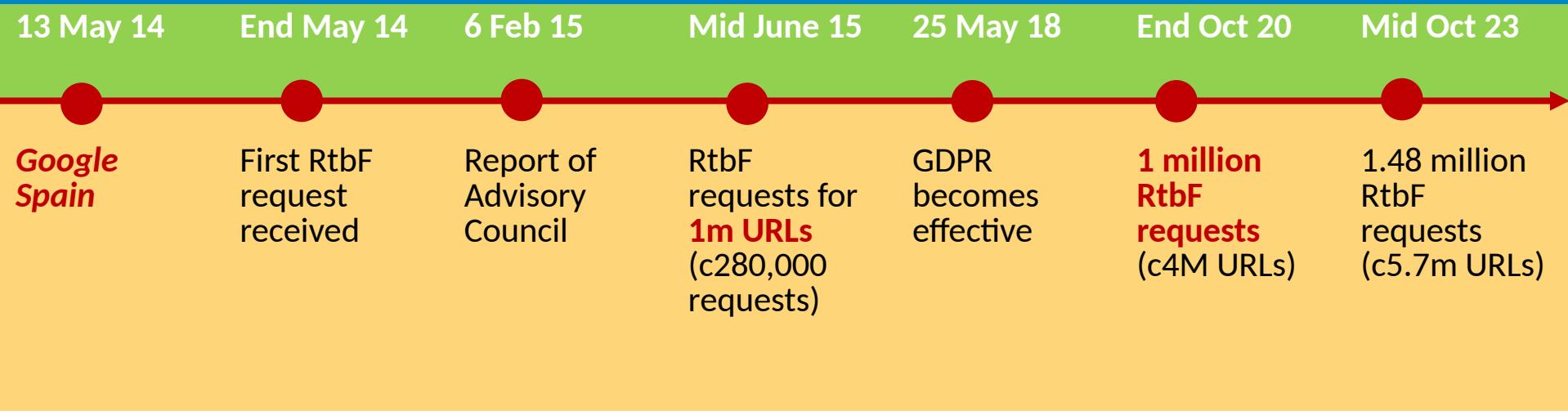
**Reason for removal \***

For each URL you provided, please explain:

# RtbF Timeline



# RtbF Timeline



# Section 92 Data Protection Act 2018

*Right to rectification or erasure ...*

(1)&(2) [rectification];



# Section 92 Data Protection Act 2018

*Right to rectification or erasure ...*

(1)&(2) [rectification];

(3) [Erasure on grounds of Art 17 GDPR];



# Section 92 Data Protection Act 2018

*Right to rectification or erasure ...*

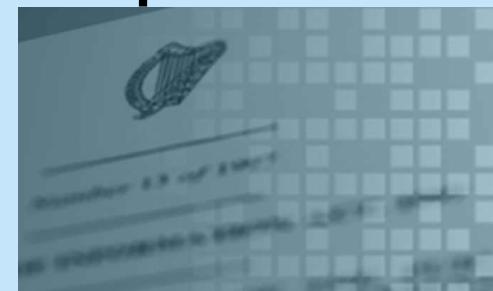
- (1)&(2) [rectification];
- (3) [Erasure on grounds of Art 17 GDPR];
- (4) Erase ASAP, within **one month**;



# Section 92 Data Protection Act 2018

*Right to rectification or erasure ...*

- (1)&(2) [rectification];
- (3) [Erasure on grounds of Art 17 GDPR];
- (4) Erase ASAP, within **one month**;
  
- (5)&(6) reasonable information;
- (7)&(8) In complex cases, may add up to  
two more months.



# How to make an erasure request



Adam Ant

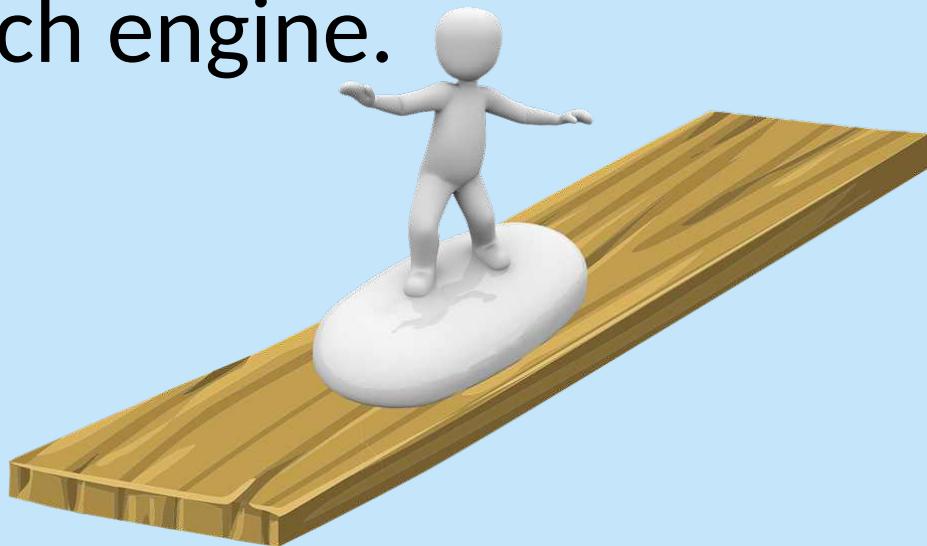
*Stand and Deliver*

# Article 17 GDPR

## *Right to erasure ('right to be forgotten')*

**Ego-surf** (vanity search, ego-search, auto-google, self-google etc):

to search for one's own name  
on a popular search engine.



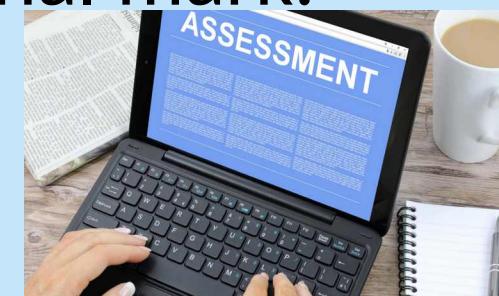
# Assessment

Please do a GDPR data subject access request or a right to be forgotten/erasure request.

Choose your target service via the link on Blackboard. We would very much like some diversity in terms of service providers, so please don't all choose the obvious one(s).

This assessment is worth **25%** of your final mark.

Submit via Blackboard on or before **Thu 30 Nov 2023** (anytime on Earth).



# <https://down.dsg.cs.tcd.ie/gdprsar/>

## witidm GDPR assignment co-ordination

Tuesday 10th of October 2023 06:44:19 AM

Please enter an email address, choose the kind of request you will be making (either SAR or RTBF), and also the (DNS) name of the service to which you plan to submit your GDPR request.

SAR means 'subject access request'. RTBF means 'right to be forgotten'. If you don't know what those mean, look or listen back to the relevant lecture, or ask a lecturer.

To avoid typos and naming inconsistency, please enter the main DNS name of the service, i.e. if you were planning to submit your request to TCD, you should enter tcd.ie (not www.tcd.ie). The script here will check that that name is real (in some sense) before accepting your input.

This script is enforcing a rule that at most five students can choose the same request type and service provider. If you plan on submitting more than one request, that's fine, just enter one here, probably best to pick the one least likely to be selected by other students.

To preserve your privacy, once your input is accepted, and added to the assigned list, you'll see an encrypted form of your email address on the list. You can use the form at the end to regenerate that value if you want to check stuff later.

This is a fairly simple script - so please don't muck about. In particular, **you cannot delete an entry once one is added, so take a minute before hitting submit!**. If things don't seem to be working for you, [send me mail](#).

### Choose your target:

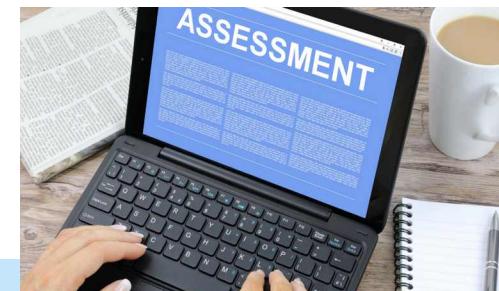
email:  Request Type:  Service DNS name:

Here are the services already chosen:

Num	Encrypted email	Type	Service
1	807df8adbfd843ad047e866958d5d0f2a835aed9236e48f062ef4f113737525	SAR	example.com

### Check your encrypted email address:

email:



# <https://down.dsg.cs.tcd.ie/gdprsar/>

TEU00311-202324 WHAT IS THE INTERNET DOING TO ME? (SECURITY AND PRIVACY FOR PEOPLE IN A CONNECTED WORLD) Overview

Success: GDPR Assignment created.

Overview

Build Content Assessments Tools Partner Content

**Overview** ↗ ↘  
GOTO <https://down.dsg.cs.tcd.ie/witidtm> or <https://github.com/sftcd/witidtm> (that's where the *real* content lives:-)  
For online sessions and office hours, we'll use the "collaborate ultra" tool.

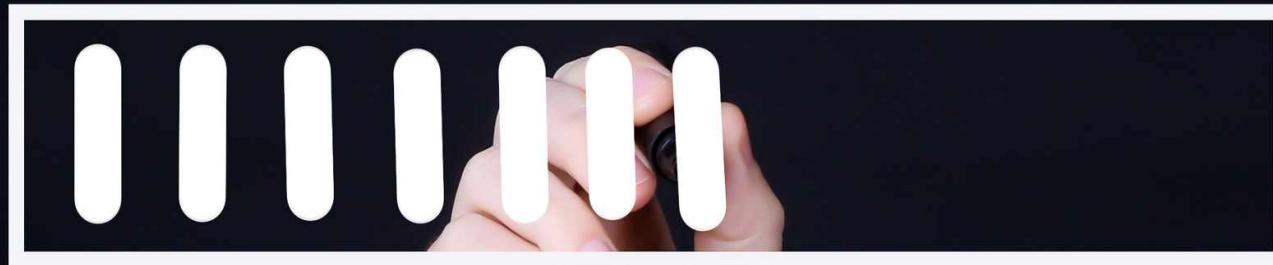
**witidtm backgrounder** ↗  
Availability: Item is hidden from students.  
A short survey to help us all level-set for the module.

**GDPR Assignment** ↗

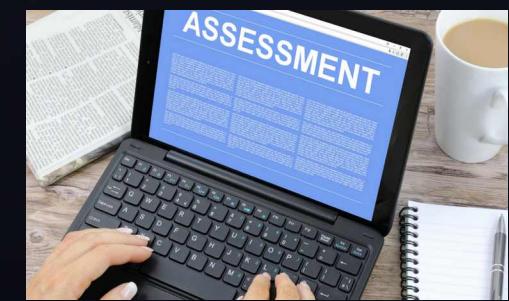


# Reminder: Assessment

GOOD LUCK



LOADING...



# Restrictions, exceptions, derogations

**Articles 2&3**

**Scope**

**Article 23**

**Restrictions**

**Article 86**

**Fol**

**Article 88**

**Employment**

**Article 89**

**Research**

**Article 91**

**Church**

# Restrictions, exceptions, derogations



# Restrictions, exceptions, derogations

Where personal data are processed, and further processed, for **research** purposes, Member State law may provide for derogations from the rights of:

**access**  
**rectification**  
**restriction**  
**object**

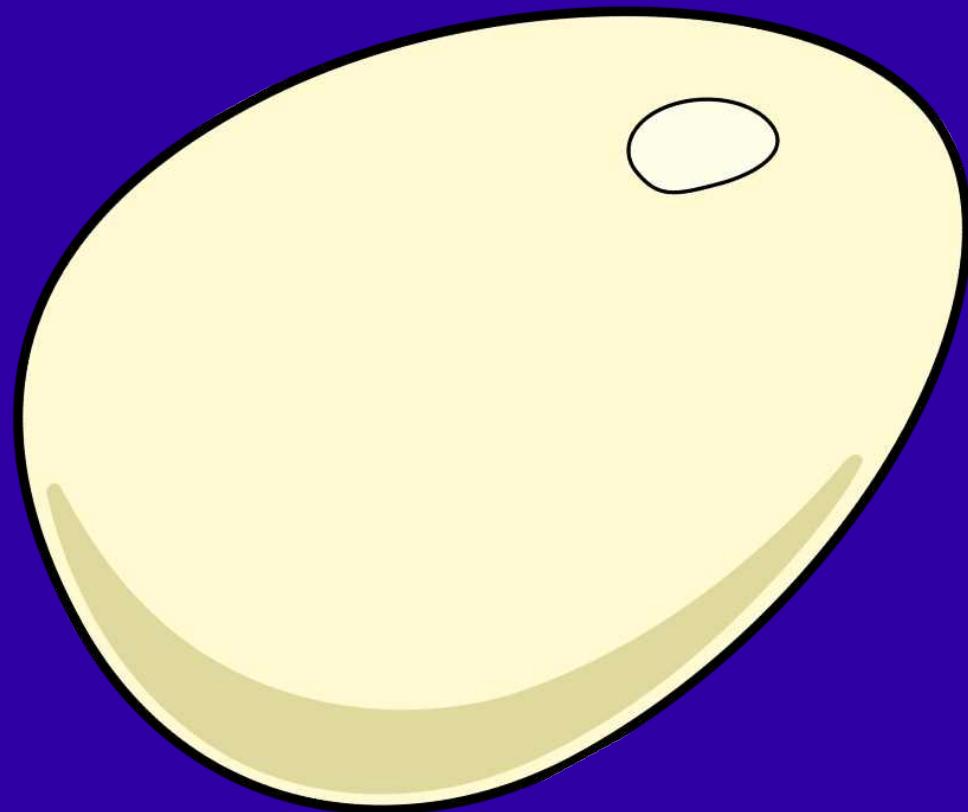


**section 61  
DPA, 2018**

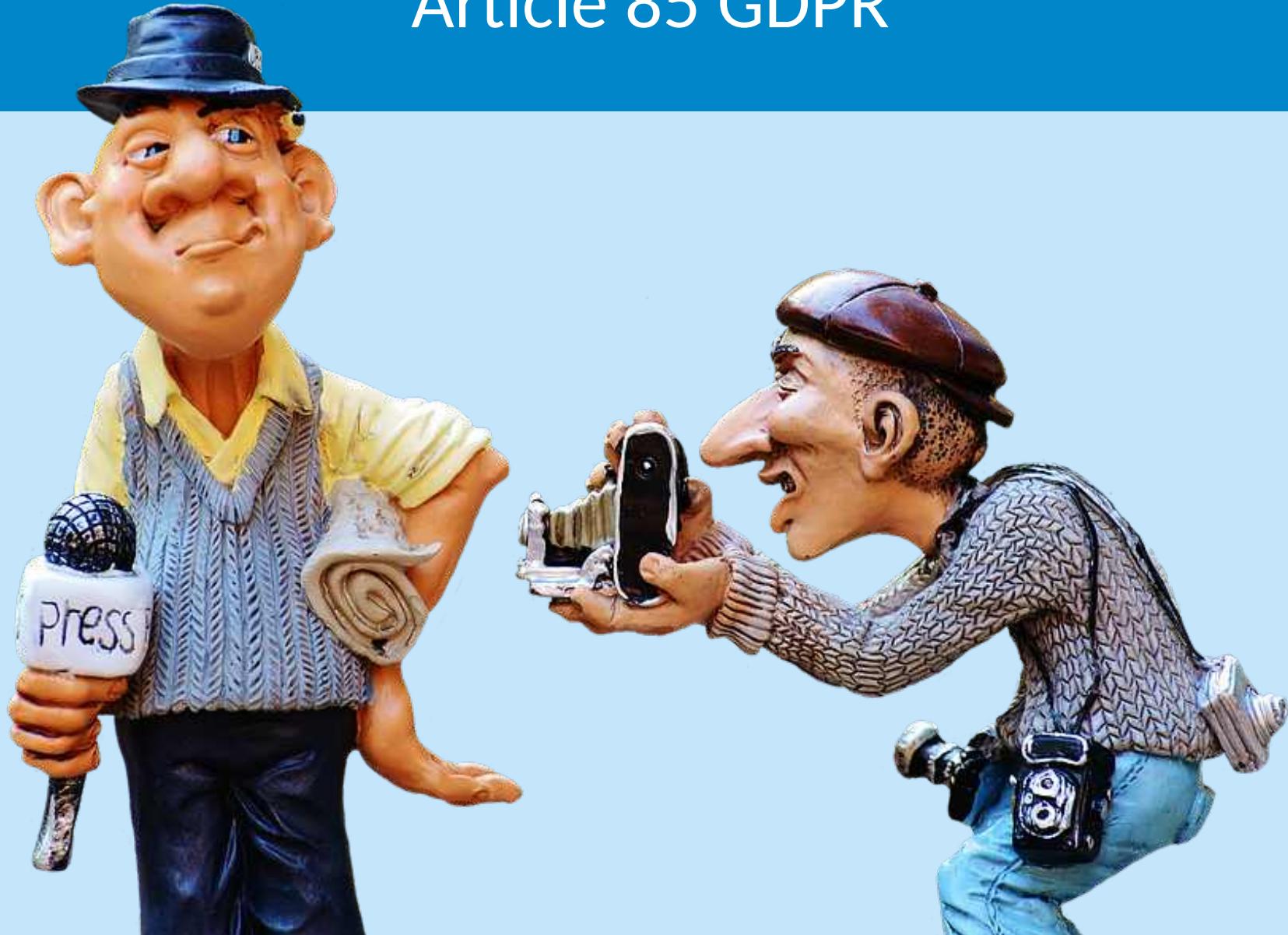
# What is the GDPR/DPA definition of “research”?



# What is the GDPR/DPA definition of “research”?

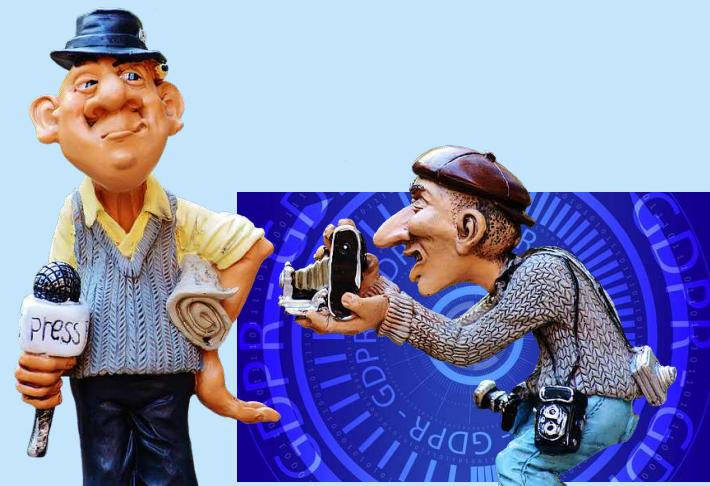


# Article 85 GDPR



# Article 85(1) GDPR

Member States shall by law reconcile the right to the protection of personal data pursuant to this Regulation with **the right to freedom of expression and information, including processing for journalistic purposes and the purposes of academic, artistic or literary expression.**



## Section 43(1) DPA18

(1) The processing of personal data for the purpose of **exercising the right to freedom of expression and information, including processing for journalistic purposes or for the purposes of academic, artistic or literary expression,** shall be exempt from compliance with ... [GDPR]



# Case 345/17 *Buivids*



# Case 345/17 *Buivids*

YouTube IE

Search

Sergejs Buivids  
9 subscribers

HOME VIDEOS PLAYLISTS CHANNELS DISCUSSION ABOUT

Uploads ► PLAY ALL

LR ieM VP inspektoru konsilijs (A.Lubins,...) 3:00

Policijas darbinieks: "Я разобью ваш телефон" 1:47

14.06.2017. LR Generālprokuratūrā 41:06

13.09.2016. LR Generālprokuratūrā VP 0:45

410 views • 3 years ago 1.4K views • 3 years ago 555 views • 4 years ago 286 views • 4 years ago

This image is a screenshot of a YouTube channel page. The channel is named 'Sergejs Buivids' with 9 subscribers. The 'HOME' tab is selected. Below it, there's a section titled 'Uploads' with a 'PLAY ALL' button. Four video thumbnails are displayed: 1. 'LR ieM VP inspektoru konsilijs (A.Lubins,...)' - Duration 3:00, 410 views, 3 years ago. 2. 'Policijas darbinieks: "Я разобью ваш телефон"' - Duration 1:47, 1.4K views, 3 years ago. 3. '14.06.2017. LR Generālprokuratūrā' - Duration 41:06, 555 views, 4 years ago. 4. '13.09.2016. LR Generālprokuratūrā VP' - Duration 0:45, 286 views, 4 years ago.

# DPC enforcement of the GDPR / DPA 18



Year	Budget	Staff
2022	€26m	[220+*]
2021	€19.1m	[200+*]
2020	€16.9m	200
2019	€15.2m	180
2018	€11.7m	140
2017	€7.5m	105
2016	€4.7m	70
2015	€3.6m	48
2014	€1.9m	31

Budget as allocated in the national Budget the October prior to the relevant year. Staff as at end of relevant year. [\*=projected].

# Article 83 GDPR - Administrative Fines



# Article 83 GDPR - Administrative Fines



# Article 83 GDPR - Administrative Fines

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UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

FORM 10-Q

(Mark One)



QUARTERLY REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the quarterly period ended June 30, 2021

or



TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from \_\_\_\_\_ to \_\_\_\_\_  
Commission File No. 000-22513

**AMAZON.COM, INC.**

(Exact name of registrant as specified in its charter)

Delaware

(State or other jurisdiction of  
incorporation or organization)

91-1646860

(I.R.S. Employer  
Identification No.)

410 Terry Avenue North, Seattle, Washington 98109-5210  
(206) 266-1000

(Address and telephone number, including area code, of registrant's principal executive offices)

Securities registered pursuant to Section 12(b) of the Act:

Title of Each Class

Common Stock, par value \$.01 per share

Trading Symbol(s)

AMZN

Name of Each Exchange on Which Registered

Nasdaq Global Select Market

# Article 83 GDPR - Administrative Fines

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On July 16, 2021, the Luxembourg National Commission for Data Protection (the “CNPD”) issued a decision against Amazon Europe Core S.à r.l. claiming that Amazon’s processing of personal data did not comply with the EU General Data Protection Regulation. The decision imposes a fine of €746 million and corresponding practice revisions. We believe the CNPD’s decision to be without merit and intend to defend ourselves vigorously in this matter.

Title of Each Class

Common Stock, par value \$.01 per share

Trading Symbol(s)

AMZN

Name of Each Exchange on Which Registered

Nasdaq Global Select Market

# Article 83 GDPR - Administrative Fines



National Commission  
for Data Protection  
Grand-Duchy of Luxembourg



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## DECISION REGARDING AMAZON EUROPE CORE S.À R.L.

06/08/2021

Given the fact that on July 29, 2021 Amazon published its quarterly results and publicly disclosed that the company was imposed a fine from the Luxembourg regulator on data protection because of infringements with the General Data Protection Regulation (GDPR), the CNPD can hereby confirm that its restricted panel issued a decision on July 15th, 2021 regarding Amazon Europe Core S.à r.l within the European cooperation and consistency mechanism as foreseen by article 60 of the GDPR.

However, the national law on data protection binds the CNPD to professional secrecy ([Article 42](#)) and prevents it from commenting on individual cases.



# Article 83 GDPR - Administrative Fines



Personal Data

Censorship

Surveillance

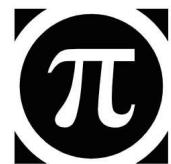
Network

Support

About EN



!



## La Quadrature du Net

**AMAZON FINED 746 MILLION  
EUROS FOLLOWING OUR  
COLLECTIVE LEGAL ACTION**

*30 July 2021*

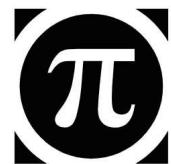


Trinity College Dublin, The University of Dublin ; image: <https://www.laquadrature.net/en/2021/07/30/amazon-fined-746-million-euros-following-our-collective-legal-action/>

# Article 83 GDPR - Administrative Fines

[Personal Data](#)[Censorship](#)[Surveillance](#)[Network](#)[Support](#)[About](#) [EN](#)

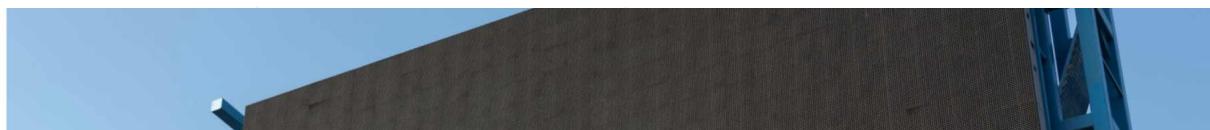
!



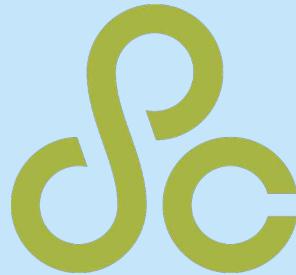
## La Quadrature du Net

On July 16 2021, the Luxembourg Data Protection Agency finally rendered its opinion on the [collective legal action](#) we and 10 000 more people took in May 2018 against Amazon. This decision breaks a three-year silence which had started to make us expect the worst.

The decision, [revealed by Bloomberg](#), suffers from no ambiguity: **the targeted ad system that Amazon forces onto us is not based on free consent**, which is a violation of the GDPR.



# DPC WhatsApp Decision (20 August 2021)



An Coimisiún um  
Chosaint Sonrai  
Data Protection  
Commission

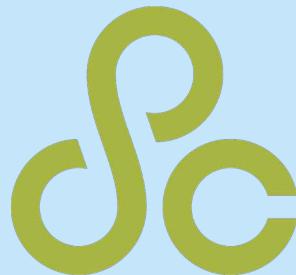


WhatsApp  
Meta

DPC found that WhatsApp had not discharged its GDPR transparency obligations with regard to the provision of information and the transparency of that information to both users and non-users of WhatsApp's service. This includes information provided to data subjects about the processing of information between WhatsApp and other Facebook companies.

**FINE: €225 million**

# DPC TikTok Decision (15 September 2023)



An Coimisiún um  
Chosaint Sonrai  
Data Protection  
Commission



DPC found that processing of personal data relating to child users of the TikTok platform in the context of:

- public-by-default settings; and
  - age verification as part of the registration process
- Infringed the GDPR.

**FINE: €345 million**

# DPC TikTok Decision (15 September 2023)

## DPC fines TikTok €345 million for violations of children's data



### The Inquiry

The DPC examined how TikTok processed children's data by looking at:

- Platform settings for child users, including the Family-Pairing setting;
- Age verification; and
- Transparency information for children.



### The Time Period

The DPC launched an investigation into TikTok in Sept 2021 and examined how TikTok processed children's data between **31 July and 31 Dec 2020**.



### The Findings

The profile settings for child user accounts were set to public by default, meaning anyone (on or off TikTok) could view the content posted by the child user.

- Articles infringed: 25(1), 25(2), 5(1)(c), and 24(1)

The 'Family Pairing' setting allowed a non-child user (who could not be verified as the parent or guardian) to pair their account to a child user's account. This allowed the non-child user to enable Direct Messages for child users above the age of 16, which posed severe possible risks to child users.

- Articles infringed: 5(1)(f) and 25(1)

The fact that profile settings for child users were set to public by default also posed several possible risks to children under the age of 13 who gained access to the platform.

- Articles infringed: 24(1)

TikTok failed to provide sufficient transparency information to child users.

- Articles infringed: 12(1) and 13(1)(e)

TikTok implemented 'dark patterns' by nudging users towards choosing more privacy-intrusive options during the registration process, and when posting videos.

- Articles infringed: 5(1)(a)



### The Outcome

The DPC has issued:

- A reprimand,
- An order for TikTok to bring their processing into compliance within three months, and
- An administrative fine of €345 million.



An Coimisiún um  
Chosaint Sonraí  
Data Protection  
Commission

# Article 82 GDPR – Compensation



# Obligations of Controllers



**Notify of All Usages, Changes**



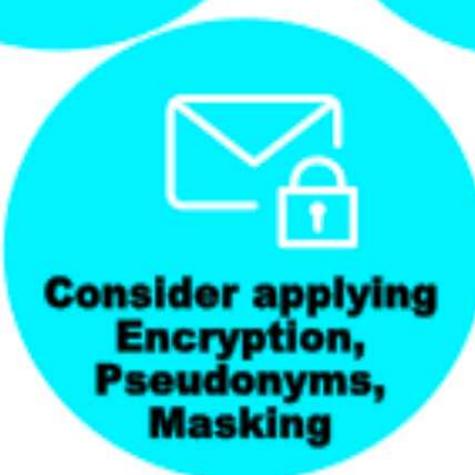
**Impact Assessments**



**Protect Data Transfers outside of EEA**



**Accountability**



**Consider applying Encryption, Pseudonyms, Masking**

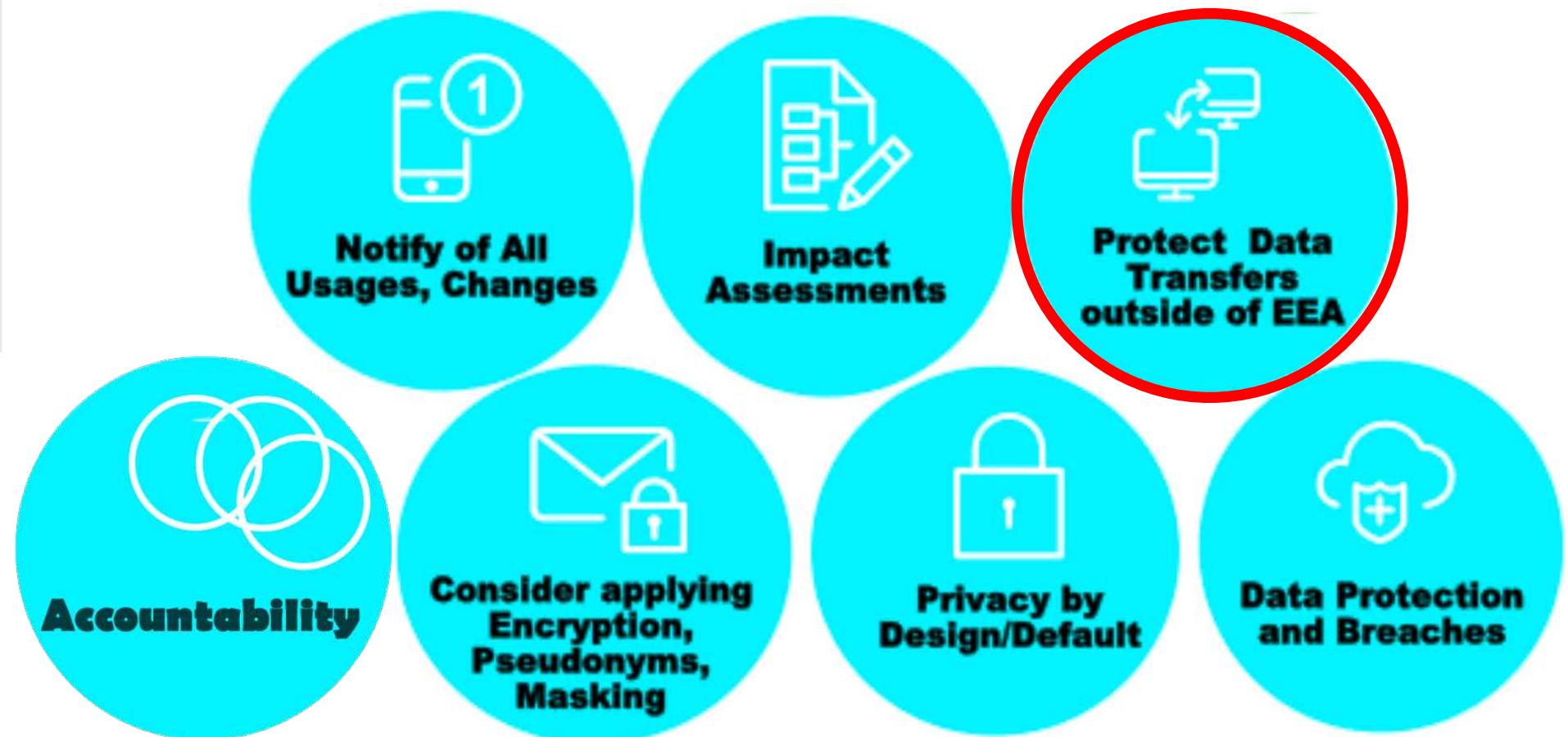


**Privacy by Design/Default**

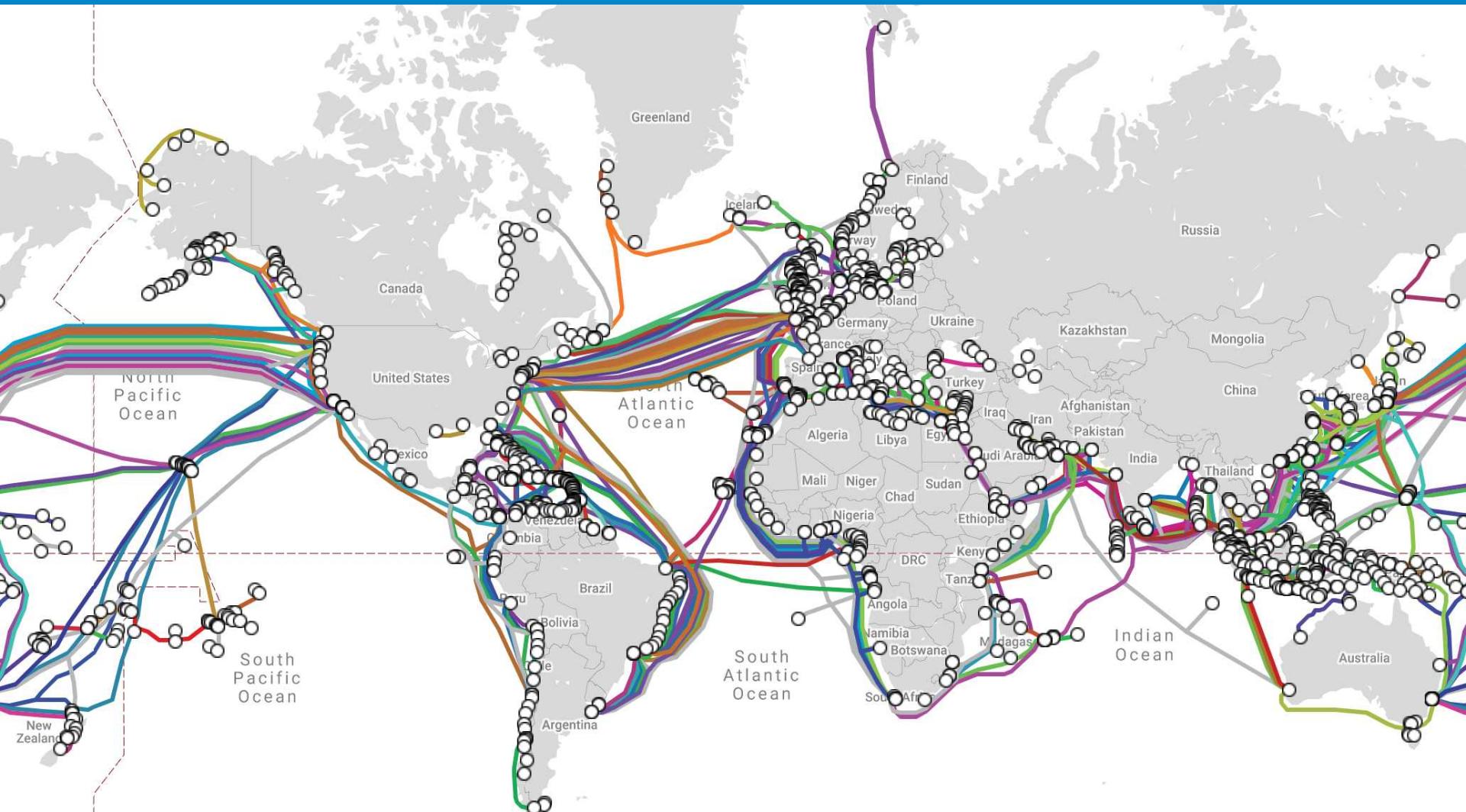


**Data Protection and Breaches**

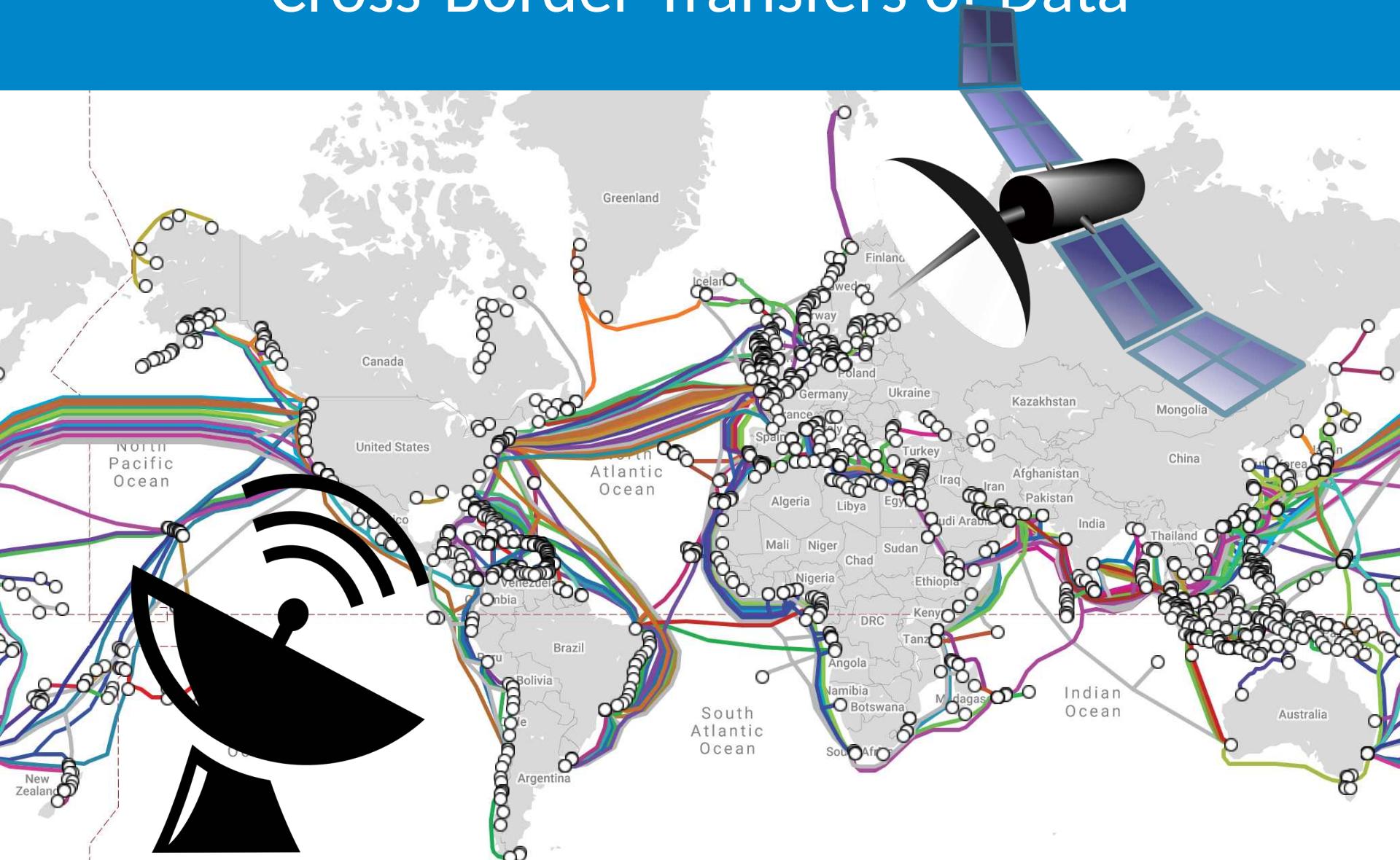
# Obligations of Controllers



# Cross-Border Transfers of Data



# Cross-Border Transfers of Data



# Chapter 5 GDPR

## Transfers of personal data to third countries



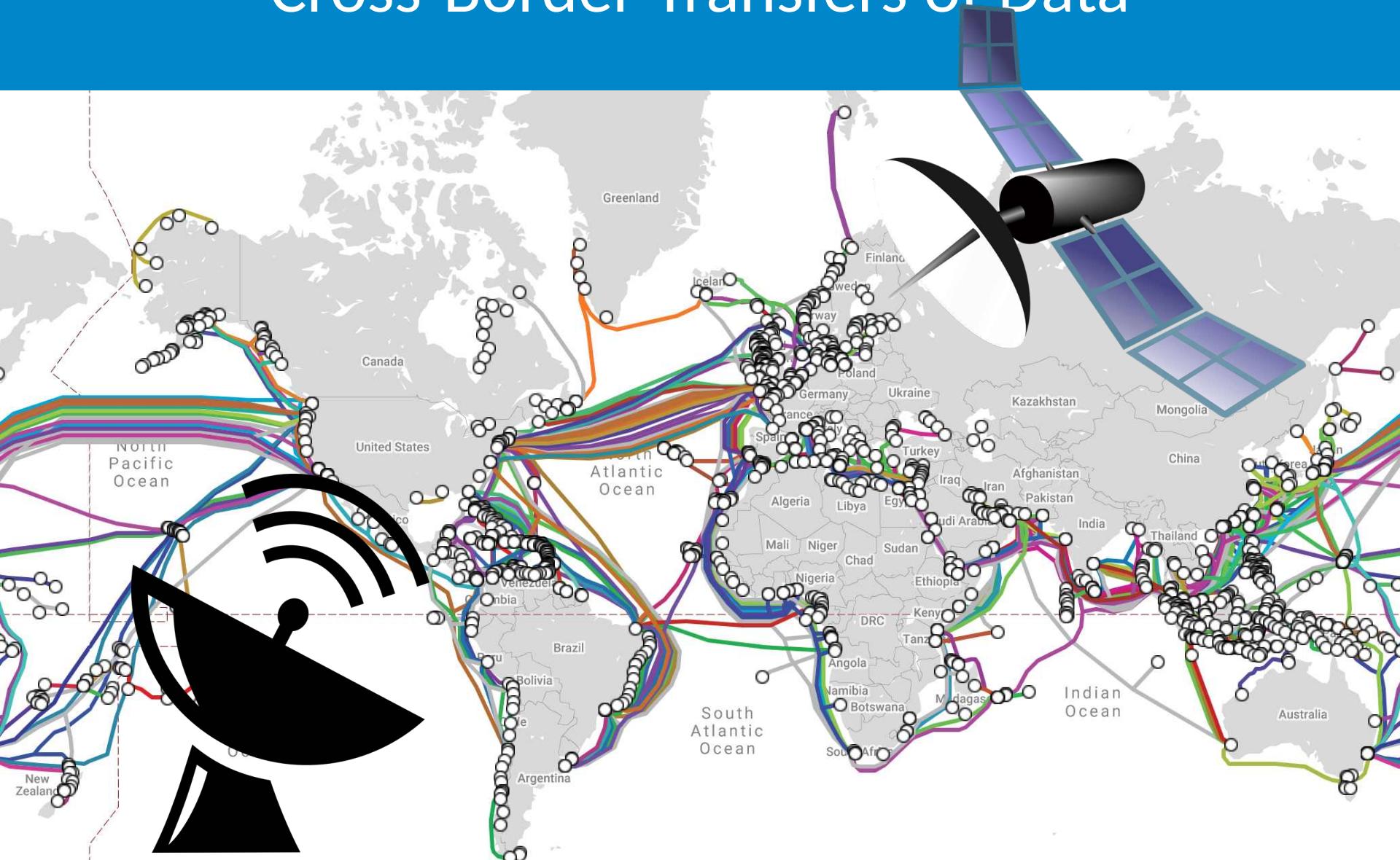
*Article 45*  
**Transfers on the basis of  
an adequacy decision**

*Article 46*  
**Transfers subject to  
appropriate safeguards  
(including **standard  
contractual clauses**)**

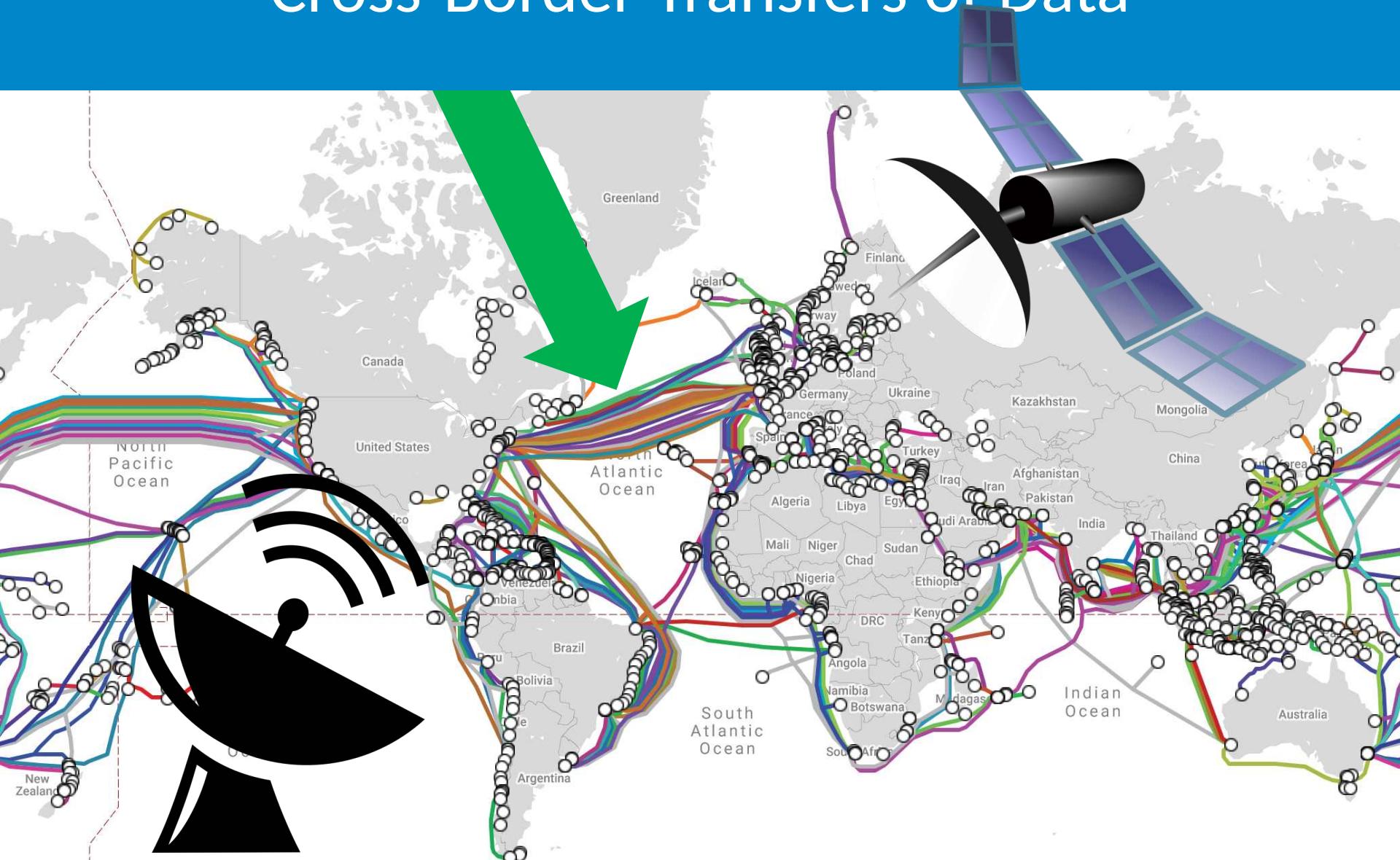
# Safe Harbo(u)r



# Cross-Border Transfers of Data



# Cross-Border Transfers of Data



# Safe Harbo(u)r



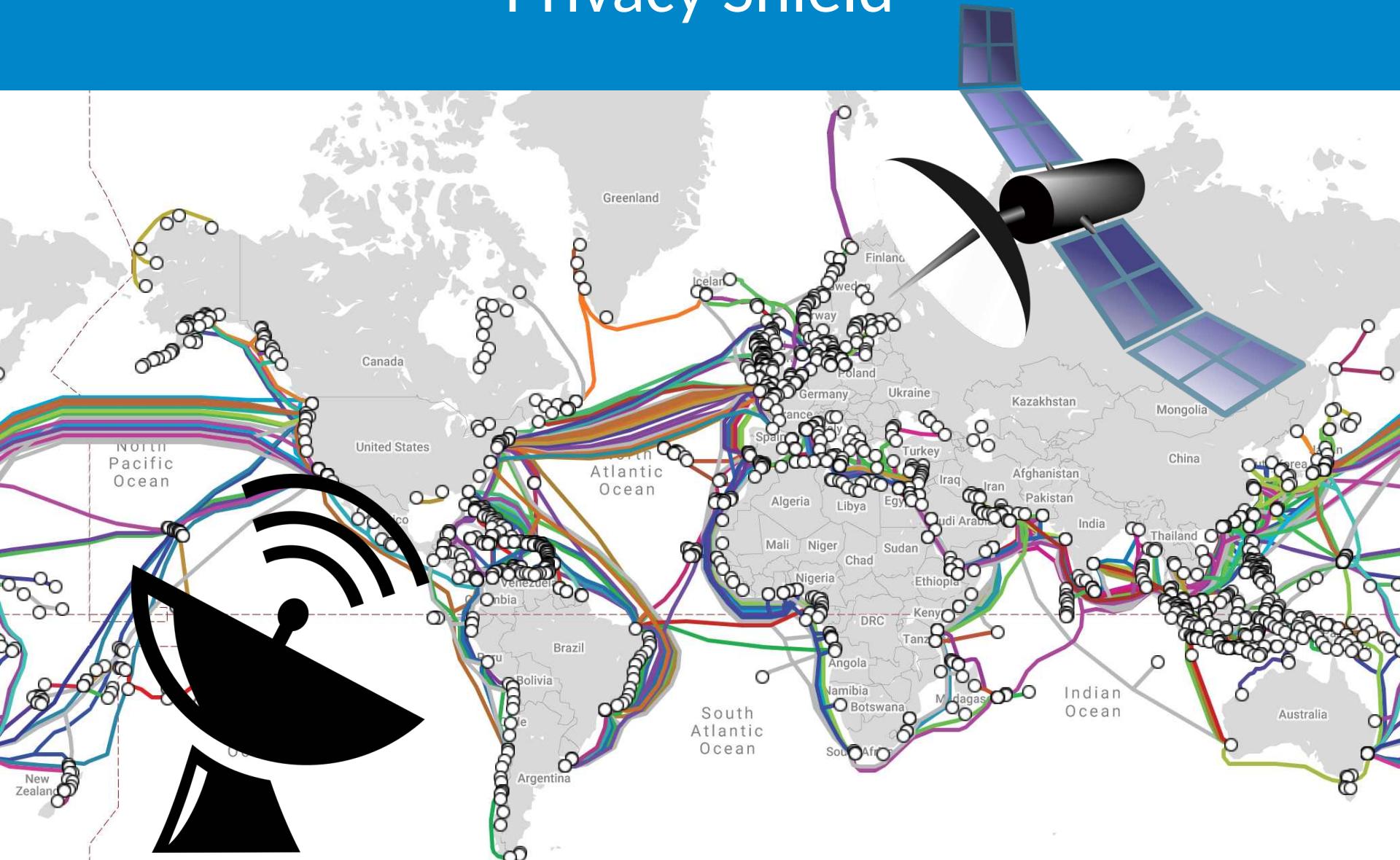
# Safe Harbo(u)r



# Data Subject Access Request



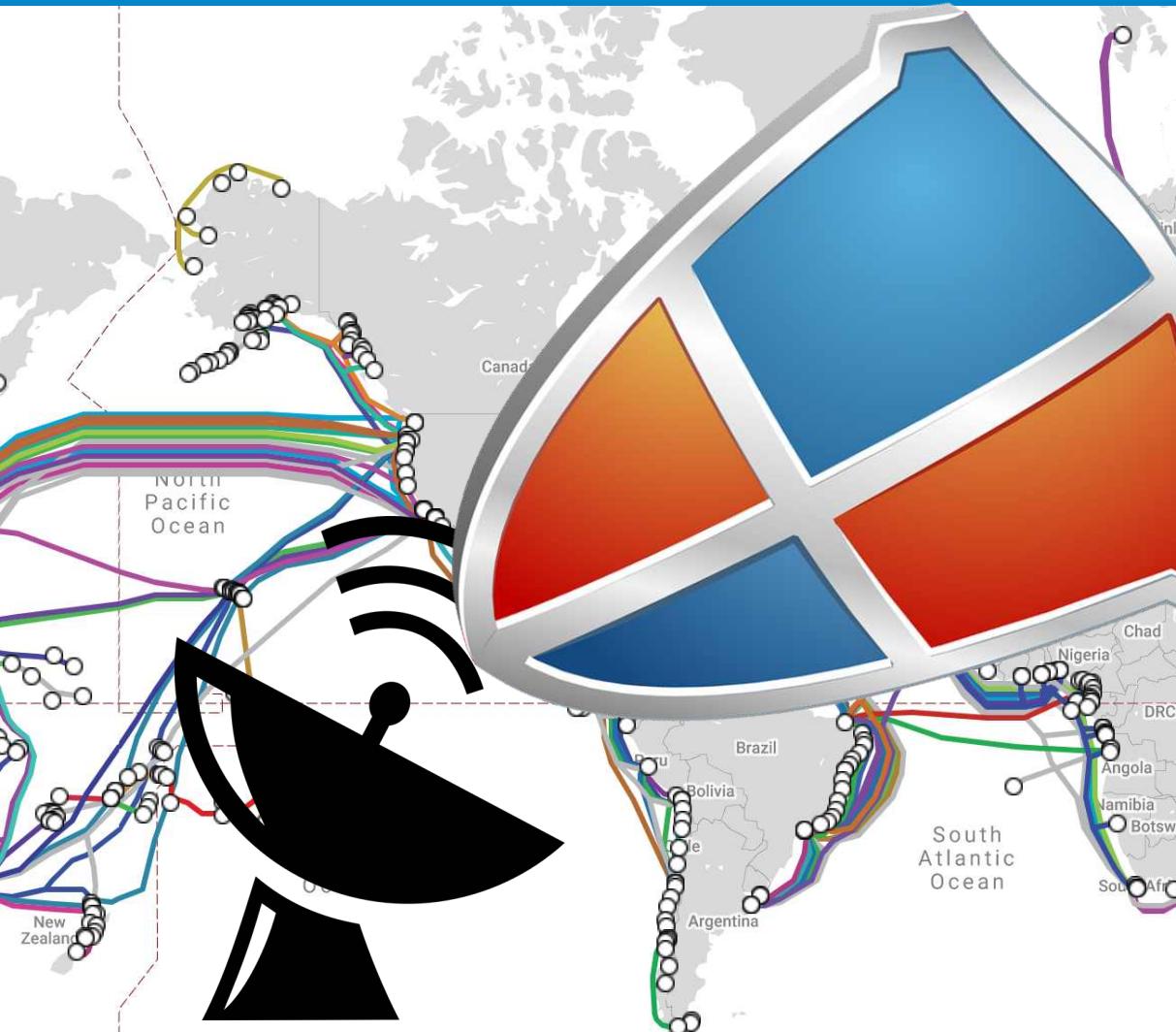
# Privacy Shield



# Privacy Shield



# Privacy Shield



Trinity College Dublin, The University of Dublin ; image: <https://www.submarinecablemap.com/#/>

<https://pixabay.com/vectors/satellite-orbit-communication-gps-307326/>

# After Privacy Shield?



English EN

Search

[Home](#) > [Press corner](#) > Joint Statement on Trans-Atlantic Data Privacy Framework



Available languages: English

▼

Press release | 25 March 2022 | Brussels

## European Commission and United States Joint Statement on Trans-Atlantic Data Privacy Framework

**25 March 2022**

# After Privacy Shield?



English **EN**

[Home](#) > [Press corner](#) > Joint Statement on Trans-Atlantic Data Privacy Framework

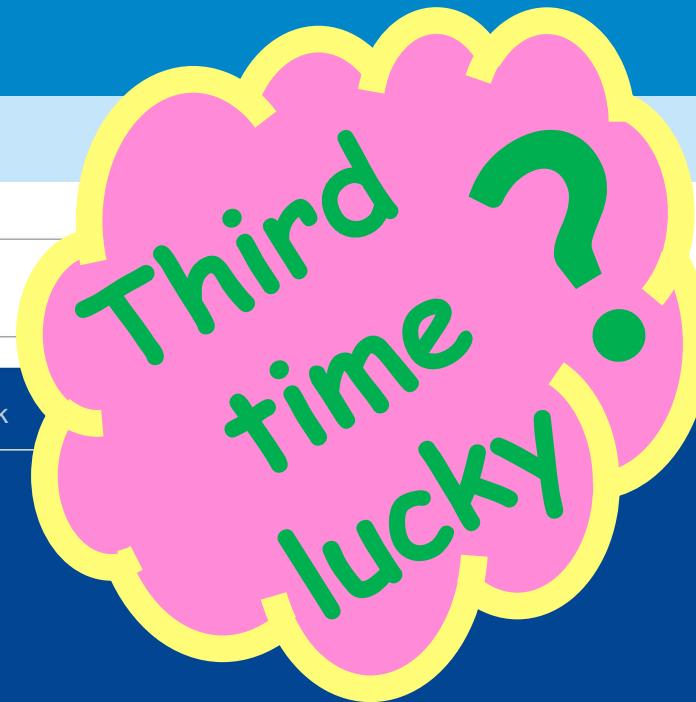


Available languages: English

Press release | 25 March 2022 | Brussels

## European Commission and United States Joint Statement on Trans-Atlantic Data Privacy Framework

**25 March 2022**



# Data Privacy Framework



WHITE HOUSE



OCTOBER 07, 2022

## FACT SHEET: President Biden Signs Executive Order to Implement the European Union-U.S. Data Privacy Framework

EO 14086  
7 October 2022



BRIEFING ROOM

STATEMENTS AND RELEASES

# Data Privacy Framework



English

Search

[Home](#) > Adequacy decision for the EU-US Data Privacy Framework

## Adequacy decision for the EU-US Data Privacy Framework

GENERAL PUBLICATIONS | 10 July 2023

**Adequacy decision for the EU-US Data Privacy Framework**



# 10 July 2023

# Thank you

Thank  
You

@cearta  
odelle@tcd.ie

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