

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Date: 10 August 2021

Processor: [REDACTED]

Phone: [REDACTED]

Fax: [REDACTED]

Sign: [REDACTED]

(Please indicate characters when replying)

For information:

[REDACTED]
[REDACTED]

[REDACTED],
[REDACTED]

[REDACTED]
[REDACTED]

User registration on [REDACTED] website- Hearing according to § 28 para. 1 Administrative Procedure Act (VwVfG)¹

- Our letter of 28 September 2020

Dear [REDACTED],

Thank you for your statement of 9 November 2020.

After a thorough assessment of your statement, we consider the matter closed.

Due to a present cross-border processing of personal data, we have already notified the decision in advance to other European supervisory authorities in the course of the One-Stop-Shop procedure pursuant to Art. 60 (3) of the General Data Protection Regulation (GDPR).²

In the course of the procedure, a European supervisory authority informed us of their concerns regarding the technical and organisational measures taken. They were of the opinion that a security measure such as an email verification procedure or an equivalent measure to ensure that the owner of the email is indeed the person registering on the controller's platform and that

¹ Administrative Procedure Act (Verwaltungsverfahrensgesetz) in the version promulgated on 23 January 2003 (BGBl. I p. 102), as last amended by Article 5(25) of the Act of 21 June 2019 (BGBl. I p. 846).

² General Data Protection Regulation of 27 April 2016 (OJ EU L 119, 4 May 2016, p. 1; L 127, 23 May 2018, p. 2; L 74, 4 March 2021, p. 35).

the data processed by the controller are indeed accurate is state of the art and does not entail a disproportionate effort and cost for a controller, given its size and global reputation, to ensure an adequate level of security in relation to the risks for data subjects within the meaning of Article 32 of the GDPR.

We share this view.

Due to the relatively low volume of complaints on the part of [REDACTED] and the LDA regarding the facts at hand, we, in agreement with the European colleagues who expressed their concerns to us, refrain from taking further official measures (such as a measure within the meaning of Article 58 (2) of the GDPR) at this point in time. Depending on any further complaints regarding user registration on the [REDACTED] website to the LDA, we reserve the right to take prompt measures within the meaning of Article 58(2) of the GDPR.

If you have any questions, please do not hesitate to contact us by telephone.

With kind regards

[REDACTED]