

Feedback on EDPB Guidelines 5/2019

on the criteria of the Right to be Forgotten in the search engines cases under the GDPR (part 1) – adopted on 2 December 2019 for public consultation

Main comment

The scope of these guidelines should preferably be extended with the subject of the Territorial scope of public search engines pursuant to Article 3 of the GDPR.

It is suggested to take into account at least the following case law:

- CJEU, C-136/17, Google v CNIL, judgment of 24 September 2019, as well as
- CJEU, C-18/18, Glawischnig-Piesczek v Facebook, judgment of 3 October 2019.