

Our ref. 11.17.001.008.076


Data Protection Officer
Crowd Tech Limited
116 Gladstonos, M. Kyprianou House,
3032, Limassol, Cyprus

Final Decision
Complaint regarding the data subjects request for erasure (IMI 122875)

A complaint was lodged in Germany (SA Schleswig-Holstein) against the controller Crowd Tech's (Trade360.com), a company whose main establishment is in Cyprus. The complaint was transmitted to the Commissioner for Personal Data Protection (Cyprus SA), to be handled as a local case.

We recall that the complaint concerns the controller's failure to comply with the erasure request of Mr. S.P. as well as the absence of consent.

Cyprus SA engaged with the controller on 27/7/2020 and requested information such as

- (a) the reasons of not complying with the erasure request of the DS, including the specific legal grounds,
- (b) the categories of personal data retained in respect of Mr S.P., and
- (c) the source of the data.

Crowd Tech explained that the reason of non-compliance with the erasure request is that the employee who directly received the data subject request, neglected to forward the request to the relevant team and DPO for immediate handling. They further affirmed that Mr. S.P's request has been handled, as soon as the complaint was received and that the DS was informed accordingly on 26/8/2020 that his data was removed. Further to our request, Crowd Tech communicated to us a copy of the email sent to the DS on 26/8/2020 (the document is uploaded in the relevant documents tab).

Crowd Tech further asserts that it received and promptly handled more than four thousand data subject requests since May 2018 and that the relevant DSR registry is available upon request.

As far as the categories of personal data concerning Mr. S.P. Crowd Tech explained that the full name, email address, telephone number and country were collected from the DS and that no further personal and/ or financial information was obtained from Mr. S.P.

As regards to the source of the data, Crowd Tech affirms that the Mr. S.P opened an account with Trade360, and expressed interest in registering. However as per later communications with the employee, it was found that he was not interested in proceeding any further.

In light of the above, Cyprus SA requested from the controller to take remedial actions as to ensure in the future that data subject's rights are recognized **by all employees** and brought to the competent department to handle the request in due course.

Considering the fact that the controller eventually complied with the erasure request, Cyprus SA is of the view that the mere delay appears to be a minor infringement which only slightly affects the data subject's rights and freedoms.

After consideration of the significance of the infringement and the controller's cooperation in the investigation process, the Commissioner considers that the investigation proceedings can be concluded as no further supervisory measure is necessary at this stage.

Best regards,

Commissioner for Personal
Data Protection
Cyprus