

Final Decision

Case Register	329048
National file number	11.17.001.009.220
Controller	At Bookshouse Ltd
Date	07.01.2022

██████████
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██████████ At Bookshouse Ltd
██████████

Dear Sir,

Further to the exchange of communications between Cyprus SA (the Commissioner for Personal Data Protection) and At Bookshouse Ltd (the Controller) concerning a complaint involving an erasure request, we would like to bring to your attention the following assessment of the Commissioner.

Description of the Case

██████████ the data subject lodged a complaint with the German SA Rhineland-Palatinate, and was thereafter received by the Office of the Commissioner for Personal Data Protection (Cyprus SA) on 13 April 2021. The complaint involved the Controller's failure to comply with the data subject's erasure request (article 17 of the GDPR) submitted to the Controller, who operates, amongst others, the website www.bookshouse.de.

The data subject, ██████████, stated in her complaint, that she contacted the publisher (the Controller), requesting, among other things, the termination of her contract and the deletion of her personal data from the publisher's records and from its websites (www.bookshouse.de and others). The data subject mentioned that she sent a letter by registered post/mail on 10/02/2021 that was delivered on 04/03/2021 and she additionally sent an email on 11/02/2021 addressed to all email addresses of the Controller. She claimed that she did not receive an answer to her erasure request and that her data and work were still advertised and viewable on the publisher's website.

Investigation by Cyprus SA

The Commissioner's office contacted the Controller via its ██████████ and requested, through email, their views on the matter raised by the complainant.

The Controller's ██████████ replied to the Commissioner's office, and among others, provided the following information:

the Controller has deleted the data subject's data

the Controller ceased its operations and has started the procedures to liquidate

the Controller has closed all its websites and currently does not have any active websites.

Cyprus SA assessment

Taking into account 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 the investigation proceedings to be concluded as no further supervisory measure is necessary at this stage.

The Commissioner reserves the right, in the event of any future complaints lodged by data subjects, to use all powers afforded to her by the GDPR and by national Law 125(I)/2018.

Commissioner
for Personal Data Protection