



## Final decision article 60

Data controller [REDACTED]  
Complainants [REDACTED], [REDACTED] and [REDACTED]

Reprimand in a personal data protection matter  
Notice of termination of proceedings

### 1. Complaint of [REDACTED]

1.1. On 4 November 2019, the Estonian data protection authority (the Data Protection Inspectorate) received the complaint of [REDACTED] through the IMI system, which was submitted to the inspectorate by the Latvian data protection authority. [REDACTED] wanted to receive information on the data collected in regard to him, including his contact data, location details, purposes of data processing, the processing method used, where and how the personal data of the complainant is retained, and when the data of the complainant was last changed. The Estonian DPA asked the Latvian DPA for more information about the complaint several times.

### 2. The correspondence between the data controller and the data subject

2. In the course of the supervision proceedings, [REDACTED] forwarded to the inspectorate the emails of the complainant [REDACTED], his various requests, and the related metadata.
- 2.1. The complainant contacted the data controller ([REDACTED]) on 28 September 2018, using the email address [REDACTED] and writing a complaint in Latvian. The inspectorate is not aware of the contents of the requests, due to the requests being made in Latvian.
- 2.2. It appears to the inspectorate that [REDACTED] responded to the request of the complainant on 28 October 2018 and forwarded to the complainant the documents concerning the complainant.
- 2.3. One of the emails does not open for the inspectorate. It appears, however, that [REDACTED] itself approached the complainant on 3 November 2018 – this correspondence also includes [REDACTED]' own request. Once again, the content of the request is difficult to understand.
- 2.4. The complainant contacted [REDACTED] again on 5 November 2018.
- 2.5. [REDACTED] answered on 7 November 2018.
- 2.6. The complainant contacted [REDACTED] on 30 November 2018. The complainant did not receive a reply to this request.
- 2.7. The complainant contacted [REDACTED] again on 2 January 2019.

- 2.8. [REDACTED] replied to the complainant's email on 2 January 2019.
- 2.9. The complainant contacted [REDACTED] again on 9 May 2019. [REDACTED] has not attached any other documents concerning emails.
- 2.10. Additionally, [REDACTED] has enclosed the complainant's communication from 25 June 2019, which is in Latvian. The inspectorate is unable to understand to whom the communication is addressed. The complainant has contacted someone also on 30 July 2019; there is a reference in the subject line to [REDACTED]. The third PDF document is entitled '[REDACTED] reply' – presumably, this document includes the response of the data controller to the complainant's requests.
- 2.11. The inspectorate asked the Latvian supervisory authority for clarification twice to understand what specifically the complainant requested; the inspectorate also asked to translate the complaint in Latvian into English.

### **3. Inquiries of the inspectorate to [REDACTED]**

3. The inspectorate then sent an inquiry to the data controller on 8 April 2020.
- 3.1. The data controller replied on 5 June 2020, apologising for not responding to the inquiry of the Data Protection inspectorate on time on 8 April 2020 and thanking for the extension of the term.
- 3.2. The data controller confirmed that the user [REDACTED] is identifiable by way of the inquiries made to the Customer Service and the emails exchanged between the complainant and the email address [REDACTED] ([REDACTED]).
- 3.3. To the knowledge of the data controller, [REDACTED] does not currently have any active user accounts. Regardless of [REDACTED]'s ability/inability to identify [REDACTED], it is therefore not feasible to change the complainant's email address. Should [REDACTED] create a new account and request that it be linked to the aforementioned email address, [REDACTED] reserves the right to refuse such a request, as the use of the word '[REDACTED]' in the email address may infringe [REDACTED]'s rights as the holder of a registered trade mark, the name may be misleading because of its other components, and therefore, it is unjustified to accept the aforementioned request.
- 3.4. The data controller added that, for reasons of data security, their preference is for customers to submit requests to close a user account and to transfer the collected data via in-app messages. This way, it is ensured in the best possible way that the actual owner of the user account is behind the request. For its part, [REDACTED] does its best to grant the requests received through other channels (email). This requires additional manual work on the part of the customer support, which is open to human error due to the large number of customers, especially if the customer uses several user accounts and more than one channel to make different requests. The combination of the following actions is likely to yield the best results: a) making the submission of data subjects' requests under the General Data Protection Regulation as simple, comprehensible, and convenient as possible when using in-app messages; b) promoting the use of the app for the above purpose among [REDACTED]'s customers, highlighting the advantages of the provided channel and the disadvantages of the alternative channels.
- 3.5. The inspectorate forwarded a new inquiry to the data controller on 13 May 2020. The inspectorate requested that the complainant be provided with all information concerning

the complainant, including the information that the complainant referred to. A request was also made to submit to the inspectorate a copy of the reply to the complainant together with the data file issued to the complainant.

- 3.6. The data controller replied on 26 May 2020 regarding the complaint made by [REDACTED] as follows:
- 3.7. [REDACTED] was provided with data about them in CSV format on 28 October 2018. The purposes of processing the data were described in 2018 (as is done currently in [REDACTED]'s Privacy Policy, available at [REDACTED]). The data retention response was forwarded to [REDACTED] on 7 November 2018 and the response log was sent in the response dated 28 October 2018. Information about [REDACTED] was appended as an attachment to the reply given to the inspectorate.

#### **4. Position of the Data Protection Inspectorate**

- 4.1. The Estonian Data Protection Inspectorate finds that the data controller has responded to the complaint and handed out information the complainant asked.
- 4.2. The data controller has cooperated with the inspectorate (provided detailed responses to enquiries, forwarded the emails [REDACTED] exchanged with complainants, as well as metadata). Therefore, it would be reasonable to reprimand the data controller in accordance with the GDPR and terminate the proceeding.
- 4.3. In regard to complaint [REDACTED], the complainant wished to receive information on the data collected in regard to them, including their contact data, location details, purposes of data processing, the processing method used, where and how the personal data of the complainant is retained, and when the data of the complainant was last changed. During the proceeding, the data controller has explained which data was collected in regard to complainant [REDACTED] and clarified that the email address of the complainant cannot be changed to contain an email address referring to the data controller, as this would entail a copyright infringement.
- 4.4. The data controller explained that based on the data security considerations, it is preferred that clients submit requests for deleting their user account or forwarding the data collected via in-app messages. That way, it can be best ensured that the request is indeed made by the actual holder of the user account. [REDACTED] shall, in turn, do its best to support the satisfaction of requests received via other channels (email) as well.
- 4.5. The data controller has sent the metadata to the inspection and clarified that [REDACTED]'s user account has been deleted. The data controller said that it is necessary by law and with legitimate interest to retain certain data, e.g. accounting documents.
- 4.6. The inspectorate finds that data processing could have been more transparent. At the intervention of the inspectorate, the data controller provided more detailed and specific answers to the complainant. This is why a reprimand is appropriate as a result of the proceeding.

#### **5. Decision of the inspectorate in the complaint of [REDACTED]**

- 5.1. The Estonian Data Protection Inspectorate finds that when processing personal data, the controller shall ensure that the data is processed lawfully, fairly, and in a transparent

manner in relation to the data subject (Article 5 (1) a) of the General Data Protection Regulation). [REDACTED] cannot be held responsible for not changing the complainant's email address to [REDACTED] – it might bring up copyright issues because the email address refers to [REDACTED].

5.2. In addition, [REDACTED] has to reply to data subjects in a more explained way, in the sense that the data subject receives their answer in depth about what data has been collected, how, when, and through what information channels. [REDACTED] has to make the responses more clear to the data subjects in general.

## **6. The Estonian Data Protection Inspectorate issues a reprimand to the data controller [REDACTED] under Article 58 (2) b) of the General Data Protection Regulation and draws attention to the following:**

6.1. When processing personal data, the controller shall ensure that the data is processed lawfully, fairly, and in a transparent manner in relation to the data subject (Article 5 (1) a) of the General Data Protection Regulation). It is also important that persons are not provided misleading information concerning the processing of data (including the deletion of data).

6.2. The data subject has a right to request the deletion of, for instance, an account as well as other personal data concerning this person without undue delay. They also have the right to demand this if there is no legal basis for the processing of data. The personal data shall be deleted without delay pursuant to Article 17 of the General Data Protection Regulation.

## **7. Complaint of [REDACTED]**

7.1. On 2 January 2020, the Estonian Data Protection Inspectorate received the complaint of [REDACTED] through the IMI system, which was submitted to the inspectorate by the Polish data protection authority. The complainant had turned to the Polish data protection authority on 25 June 2019.

7.2. According to the complaint, the citizen wanted to delete their user account and personal data from the [REDACTED] system. Prior to that, the complainant had wanted to receive information collected about themselves. The complainant sent a letter to [REDACTED] on 16 May 2019 requesting [REDACTED] to delete their personal data. This letter was sent to the email addresses [REDACTED], [REDACTED] and [REDACTED]. The complainant was told by customer support that the deletion of data would take place through the [REDACTED] application. The complainant adds that by the time of contacting [REDACTED]'s Polish customer support, the complainant had already deleted the application. The complainant wants to see the data collected about the complainant.

## **8. The correspondence between the data controller and data subject**

8.1. On 16 May 2019, the data subject wrote the following to the controller:  
In accordance with the point "8.Deletion" of [REDACTED] "Privacy for Passengers" and in the article 17 of GDPR, I hereby request to permanently delete my [REDACTED] account, I withdraw all consents to the processing of any of my personal data and I request to delete all data collected about me.

Beforehand, in accordance with the point "9. Portability" of [REDACTED] "Privacy Policy for Passengers" and relevant regulations of GDPR, please send to my e-mail address or via another agreed channel all the data collected about me.

8.2. [REDACTED] replied on 19 May 2019 that for the account to be deleted, the request must be sent through the application (from [REDACTED]).

8.3. Somehow, there is a response on 16 of May 2019 from [REDACTED], which says, “We are currently struggling with a significant number of incoming reports; our responses can therefore reach you later than usual.” (It might be an automatic response).

8.4. On 19 May 2019, the data subject sent an email to [REDACTED], saying the following:  
I’m sorry, but you did not understand my request. You also did not check the exact status of my account (I submitted a request to delete my account in the application already on 16 May, and especially for you, I just created an account and re-submitted a request to delete it). Deleting the account is just one element of my request. I am waiting for the next part to be completed.

First of all, you have not read or understood my previous message. Please read and understand my request from 16 May 2019, in particular regarding the erasure of collected data. Before that, I recommend you familiarize with your own Privacy Policy and provisions of GDPR.

In the event of [REDACTED] failing to fulfil its statutory obligation, the matter will be referred to the President of UODO (Personal Data Protection Office). Let me remind you that a fine up to EUR 20 million and up to 4% of the total annual turnover of the preceding financial year may be imposed for breaching the provisions of the GDPR.

Please treat my request from the previous email carefully, seriously and consider it with due diligence.

8.5. On 21 May 2019, the data subject once again wrote to the data controller:

Mrs [REDACTED],

I assure you that I got acquainted with it. I see, however, that we do not understand each other, therefore I want to end my correspondence with you at this point. I consider my request still unsolved by the [REDACTED] office in Warsaw.

I inform you that I will await for a response from competent individuals within your organization (i.e. Data Protection Officer at [REDACTED] until June 16. All messages in this correspondence were also sent to him and to customer support ([REDACTED]).

In case of further evasion of the obligation imposed by the GDPR, on 17 June 2019, an adequate letter will be sent to the UODO.

## **9. Inquiries of the inspectorate to [REDACTED]**

9.1. The inspectorate then sent an inquiry to the data processor on 8 April 2020. The Polish complainant has contacted [REDACTED] for clarification and deletion of the data, but they are not satisfied with the answers provided. Polish national, [REDACTED], requests a copy of the data collected about them and allegedly not sent to them by [REDACTED]. The inspectorate asked to forward all information and data collected on the Polish citizen, [REDACTED]. Additionally, the inspectorate requested [REDACTED] to delete data that could be deleted by [REDACTED] in relation to [REDACTED] and provide the inspectorate an explanation regarding this (which data was deleted).

9.2. [REDACTED] replied on 5 May 2020:

In answering this question, we ask the Data Protection Inspectorate to specify the details of the transmission of the information and data collected (addressee, method and channel of transmission, if the Data Protection Inspectorate has any preferences in this regard). In particular, does the Data Protection Inspectorate: a) request that the information and data be provided directly to [REDACTED] or b) want the information and data to be transmitted to an official designated by the Data Protection

Inspectorate, whose personal identification code could be used by [REDACTED] to encrypt the information and data transmitted? Please indicate the above preference for the transmission of information and data no later than by 8 May 2020. In the absence of input, [REDACTED] will forward the collected information and data directly to [REDACTED] by email no later than 8 May 2020 and will share with the Data Protection Inspectorate the email confirming the transmission.

9.3. We have clarified in our previous cooperation with the Data Protection Inspectorate (see our answer to inquiry 2.1-1/19/1946 of the Data Protection Inspectorate) that the deletion process includes the following actions: - the user is logged out of the application (force logout); - first name and surname are deleted (fields are left blank); - the email address is deleted (the field is cleared); - the telephone number is replaced by a sequence of random numbers; all communication with the customer (especially the newsletter) is prohibited; - the deletion command is transmitted to the associated systems (communication platforms).

9.4. The user was identified through customer service inquiries and emails. Based on these and [REDACTED]'s information system logs, the chronology of user-related actions is as follows:

Account 1: 06.09.2018 – creation of the account (account\_no: [REDACTED])

Account 1: 11.05.2019 – account deletion request (in-app request)

Account 1: 16.05.2019 – account is deleted, information is provided to the customer. The customer does not notice the confirmation of account deletion.

Account 2: 19.05.2019 – a new request from the customer to delete the account is sent by email and instructions for making an in-app request are sent to the user.

Account 2: 19.05.2019 – the customer creates a new account (account\_no: [REDACTED]) and sends an in-app request for the new account to be deleted.

Account 2: 21.05.2019 – customer service sends an in-app confirmation message that the account will be deleted within 30 days.

Account 2: 25.05.2019 – the new account is deleted. [REDACTED]'s inquiries were answered, the deletion of accounts was performed more quickly than required under Article 12 (3) of the General Data Protection Regulation.

In summary, the requests for deleting the in-app user account were granted on 16 May 2019 and 25 May 2019 – however, the request set out in point (ii) was difficult to comply with and it was not fulfilled.

The following contributed to this result: a) the abundance of communication channels and the customer's statements of intent; b) the fact that [REDACTED]'s customer service may have assumed that the scope of the customer's later statement of intent (19 May 2019 in-app request) (delete only the user account) may take precedence over the scope of the customer's previous statement of intent (19 May 2019 email; deletion and prior transmission of the data collected). A further analysis of the communication related to this complaint indicates that the customer's actual statement of intent included the transmission of the data collected about them. Further internal investigation will allow [REDACTED] to fulfil the customer's actual request, which we want to achieve no later than 8 May 2020, by forwarding the requested data to the email address of [REDACTED]

9.5. The inspectorate forwarded a new inquiry to [REDACTED] on 13 May 2020, requesting that the inspectorate be provided with the information provided to [REDACTED] in connection with their complaint. At that point, a third complaint, by [REDACTED], came to the attention of the inspectorate, and the inspectorate asked [REDACTED] for clarification.

9.6. [REDACTED] answered on 19 May 2020 forwarding the reply sent to [REDACTED] on 8 May 2020. [REDACTED] also included all the data that [REDACTED] had collected on [REDACTED]

9.7. [REDACTED] replied to the inspectorate on 26 May 2020 regarding the inquiry made by the inspectorate on 13 May 2020. In this reply, regarding [REDACTED] [REDACTED] summarily stated the following: *'We have issued [REDACTED]'s personal data as encrypted files to the Data Protection Inspectorate on behalf of [REDACTED] on 18 May 2020 by email.'*

## **10. Position of the Data Protection Inspectorate**

10.1. The Estonian Data Protection Inspectorate finds that the data controller has responded to the complainant and cooperated with the inspectorate (provided detailed responses to enquiries, forwarded the emails [REDACTED] exchanged with complainants, as well as metadata). Therefore, it would be reasonable to reprimand the data controller in accordance with the GDPR and terminate proceedings regarding the three complainants.

10.2. The data controller explained that based on the data security considerations, it is preferred that clients submit requests for deleting their user account or forwarding the data collected via in-app messages. That way, it can be best ensured that the request is indeed made by the actual holder of the user account. [REDACTED] shall, in turn, do its best to support the satisfaction of requests received via other channels (email) as well.

10.3. The complaints have indicated that if the data subject takes the necessary steps inside the application to express their will, be it to access the data collected, close the account, or make any other request, communication between the data subject and [REDACTED] will then function better. The abundance of communication channels has created communication problems. Therefore, it is reasonable for [REDACTED] to direct customers with an account to make their declarations of intent through the application.

10.4. The inspectorate finds that data processing could have been more transparent. At the intervention of the inspectorate, the data controller provided more detailed and specific answers to the complainants. Therefore, a reprimand to the data controller is needed. This is why a reprimand is appropriate as a result of the proceeding.

## **11. Decision of the inspectorate in the complaint of [REDACTED]**

11.1. Concerning [REDACTED]'s complaint, The Estonian Data Protection Inspectorate finds that the data controller shall clarify and be more precise when answering the questions that the data subject asks. The data processing should be more transparent. Although the data was sent to the complainant, the data controller who has identified the data subject can hand out personal data directly to the complainant without the inspection starting a state procedure.

11.2. The data concerning [REDACTED] has been directly handed out to the complainant and was later deleted. Therefore, the data controller cannot be held responsible for not handing out the data concerning the complainant. Nonetheless, a reprimand to the controller is necessary because the data subject is entitled to ask information collected about them. The data controller has to reply to the data subject within one month based on Article 12 (3) of the General Data Protection Regulation. If the request had been fulfilled faster and directly to the data subject, then there would be no complaint in the first place.

## **12. The Estonian Data Protection Inspectorate issues a reprimand to the data controller [REDACTED] under Article 58 (2) b) of the General Data Protection**

## **Regulation and draws attention to the following:**

12.1. When processing personal data, the controller shall ensure that the data is processed lawfully, fairly, and in a transparent manner in relation to the data subject (Article 5 (1) a) of the General Data Protection Regulation). It is also important that persons are not provided misleading information concerning the processing of data (including the deletion of data).

12.2. The data subject has a right to request the deletion of, for instance, an account as well as other personal data concerning this person without undue delay. They also have the right to demand this if there is no legal basis for the processing of data. The personal data shall be deleted without delay pursuant to Article 17 of the General Data Protection Regulation.

## **13. Complaint of [REDACTED]**

13.1. [REDACTED] turned to the Polish data protection authority on 4 February 2019 to delete her [REDACTED] account, but to do so, she was asked to provide a picture of herself with an ID-card. In her initial complaint to Poland, the complainant wrote that on 5 January 2019, she requested that [REDACTED] delete her personal data. The complainant has not specified whether she is driver or a customer. The complainant wrote to the email address [REDACTED].

## **14. The correspondence between the data controller and data subject**

14.1. The correspondence between the complainant and [REDACTED] shows that on 5 January 2019, the complainant wrote that she wished to delete her account:

1.1. [REDACTED]

5 January, 17:46 EET

I resign. Please erase my e-mail and phone number from your database.

[REDACTED]

5 January, 18:34 EET

Good morning,

Certainly, I will satisfy your request, however I would like to inquire what is the reason for the resignation from our services? Are you certain you wish to delete your account?

[REDACTED]

5 January, 18:42 EET

I am certain. The reason is the multitude of notifications about discount (SMS, mail, app notifications).

[REDACTED]

5 January, 19:02 EET

The deletion of your phone number can be done only if your entire account will be deleted. There is a possibility to only cancel the notifications, so they don't disturb you anymore. Therefore, what do you choose, cancellation of the notifications or the deletion of the entire account?

[REDACTED]

5 January, 19:04 EET

What do you mean by 'cancellation of notifications'?



5 January, 19:09 EET

Right now your setting regarding the receipt of notifications and messages is turned on. I can turn it off, so that all the offers will be blocked. The only messages you will receive would be the ones concerning the confirmations of fares, which is required by law.

5 January, 19:12 EET

Ok. Please, delete my account.

6 January, 08:29 EET

Good morning,

Ok, I will get to it right away. The last thing I need to ask you is your clear photograph with an ID card close to your face (all this data will be deleted with the account) so that I can confirm your identity. It is necessary at this moment, so that I can continue.

20.03.2019, the complainant further contacted the Polish data protection authority, explaining that they did not know where to turn. They added the address and contacts of the data controller, noting that the violation related to their contact details.

## 15. Inquiries of the Inspectorate to [REDACTED]

15.1. The Inspectorate sent an inquiry to the data controller on 13 May 2020 as to the legal basis on which the complainant is obliged submit a picture of themselves together with their ID-card to delete their [REDACTED] account.

15.2. [REDACTED] replied on 26 May 2020:

‘Pursuant to Article 12 (6) of the GDPR, where the data controller has reasonable doubts concerning the identity of the natural person making the request, the controller may request the provision of additional information necessary to confirm the identity of the data subject. The legal basis for processing the image and the ID-card is the legitimate interest of [REDACTED] as the data controller. Providing a picture and ID-card helps to prevent fraud and allows to identify the person requesting the deletion of the account. This will also prevent a potentially more significant violation that would result from the deletion of data at the request of the wrong person. However, [REDACTED] prefers to receive the data subject’s request for deletion through the application, which does not require additional information. Additional information in the form of a picture and ID-card is required only if identification inside the application is unsuccessful.

[REDACTED]’s account has been deleted as at 22 October 2019.’’

## 16. Position of the Data Protection Inspectorate

16.1. The Estonian Data Protection Inspectorate finds that the data controller has responded to the complainant and cooperated with the inspectorate (provided detailed responses to enquiries, forwarded the emails [REDACTED] exchanged with complainants, as well as metadata). Therefore, it would be reasonable to reprimand the data controller in accordance with the GDPR and terminate proceedings regarding the

complainant.

16.2. The data controller explained that based on the data security considerations, it is preferred that clients submit requests for deleting their user account or forwarding the data collected via in-app messages. That way, it can be best ensured that the request is indeed made by the actual holder of the user account. ██████████ shall, in turn, do its best to support satisfaction of requests received via other channels (email) as well.

16.3. The account of ██████████ has been deleted, so the breach has been eliminated.

16.4. The inspectorate finds that data processing could have been more transparent. At the intervention of the inspectorate, the data controller provided more detailed and specific answers to the complainant. The data controller should have been clearer about the fact why and on what legal grounds it is necessary to present an ID-card. Therefore, a reprimand to the data controller is needed. This is why a reprimand is appropriate as a result of the proceeding.

**The complaints have indicated that if the data subject takes the necessary steps inside the application to express their will, be it to access the data collected, close the account, or make any other request, communication between the data subject and ██████████ will then function better. The abundance of communication channels has created communication problems. It is also more difficult to identify the user and their identity when the communication takes place outside the application. Therefore, it is reasonable for ██████████ to direct customers with an account to make their declarations of intent through the application.**

## **17. Decision concerning ██████████ complaint**

17.1. Concerning ██████████'s complaint, The Estonian Data Protection Inspectorate finds that ██████████ has the right to ask for the ID-card pursuant to Article 12 (6) of the GDPR. ██████████ has made clear that without prejudice to Article 11, where the controller has reasonable doubts concerning the identity of the natural person making the request referred to in Articles 15 to 21, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

17.2. The data controller also has made clear that it does not ask for an ID-card when the inquiries are made in the application and are completed successfully. An ID-card is requested when the inquiries in the application have failed. ██████████ only asked for the ID-card to protect sensitive information collected about the complainant. The data controller had to make sure that the person asking information is really the real user. The data controller has made an effort to protect the data. However, the data controller has to explain exactly why and on what legal grounds the ID-card is being asked.

## **18. The Estonian Data Protection Inspectorate issues a reprimand to the data controller ██████████ under Article 58 (2) b) of the General Data Protection Regulation and draws attention to the following:**

18.2. When processing personal data, the controller shall ensure that the data is processed lawfully, fairly, and in a transparent manner in relation to the data subject (Article 5 (1) a) of the General Data Protection Regulation). It is also important that persons are not provided misleading information concerning the processing of data (including the deletion of data).

18.2. The data subject has a right to request the deletion of, for instance, an account as well as other personal data concerning this person without undue delay. They also have the right to demand this if there is no legal basis for the processing of data. The personal data shall be deleted without delay pursuant to Article 17 of the General Data Protection Regulation.

18.3. The controller is obligated to explain why certain documents are required from the complainant (e.g. [REDACTED]). The data controller could have explained to the complainant in more detail why and under what legal basis they requested them to provide a copy of their ID-card. This could have prevented the submission of a complaint to the supervisory authority.

In view of the above, we shall terminate the supervisory proceeding.

This decision may be challenged within 30 days by submitting one of the two:

- A challenge to the Director General of the Estonian Data Protection Inspectorate pursuant to the Administrative Procedure Act<sup>1</sup>, or
- An appeal to an administrative court under the Code of Administrative Court Procedure<sup>2</sup> (in this case, the challenge in the same matter can no longer be reviewed).

Respectfully

[REDACTED]

Lawyer

Authorised by the Director General

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<sup>1</sup> <https://www.riigiteataja.ee/en/eli/527032019002/consolide>

<sup>2</sup> <https://www.riigiteataja.ee/en/eli/512122019007/consolide>