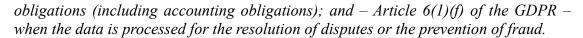


Ours: 04.10.2023 nr 2.1.-1/23/103

Final Decision

. Accord application) and succeed to him that provided by 10 days. The new account again, but the support, the	ing to the complaint on 20 December 20 ed, but was unable to the driving licence with Helpdesk, the complainant also do to for using the driving licence was omplainant contacted.	regarding the storage, the complainant decay. The following day of validate his driving was linked to another the driving licence we letted a new account same data as before all and, according to the linked to another according to the storage of	tonian DPA) received ge of his personal data beleted his account y, the complainant creating licence and the first account. According to a condition on 09.01.2023. The condition of the explanations provide ount. Customer support again on 13 January	(in the account Helpdesk explained to the explanations to only a count after complainant made a this driving licence and by the customer asked to wait 3-4
identification personal dat policy states above. This depending of data. Your day we will dele	n of data subjects of a are processed ('sta that the data will on means that we reta in the type of data, the data will be kept for a te your data (in acce	nly for as long as is orage restriction'). It is stored for as long ain different categor he related service and s long as you have an ordance with our dat	are to be retained in a finecessary for the purple as necessary for the pies of data for different the purposes for which active account. If your taretention schedule as prevention	pose for which the privacy purposes described nt periods of time ch we collected the raccount is closed, and policies) unless
Article 56 of	f the GDPR. Since	is	on of the lead supervisors a company operating the hority which conducted	in Estonia the Data
Estonian DP	A made an inquiry to	o	, to which they replie	ed as follows:
to co preve	omply with legal of ention purposes. In the rticle 6(1)(c) of the C	obligations or for a his case, the data wil	data will be deleted un eccounting, dispute re l be retained on the foll eta is necessary for con	esolution or fraud lowing legal bases:



2. This retention schedule for the Car Sharing Service and the processing operations are set out in the Privacy Notice, which is available on the "Legal" tab. The privacy notice for Estonian residents is available and a notice for residents of Latvia

According to this Privacy Notice, the User's data will be stored for as long as he/she has an active account. If the account is closed, the user's data shall be deleted unless such data is required for the following purposes: to comply with legal obligations or for accounting, dispute resolution or fraud prevention purposes.

3. The main reason for the misunderstanding is the fact that several accounts were registered and deleted by the data subject within a short period of time (i.e. between 20 December 2022 and 9 January 2023) and that each time the data subject's requests (linked to the new account) were handled by different staff. The reason why the data subject's request was handled each time by a different employee was that each time the data subject deleted/registered a new account and contacted 's support team, it created a new so-called ticket (tickets, angel ticket, used to share 's internal tasks) 's systems to the customer support team. As all accounts were "new" accounts, unfortunately, customer support tickets were not interlinked, which meant that the data subject was in contact with many customer support staff. has a system that supports the deletion of accounts, but this is not an immediate process. account from the user's view immediately, but internal processing of the application takes up to 10 days. Until the complete account deletion is carried out within user cannot verify himself/herself with the new account, as his/her data may still be registered in 's internal systems until the process of fulfilling the deletion request has yet been completed. This led to a misunderstanding as the data subject tried to create new accounts too quickly after each account was deleted. Thus, all accounts created by the data subject (a total of 4 previous accounts) have been deleted and the data subject has successfully completed the verification of his current account driving provides a comprehensive response to the data subject in order licence on 6.2.2023. to resolve the confusion that has arisen and to clarify the situation.

Estonian DPA finds that in this case there was a human error and misunderstanding that was caused partially by the complainant, since he registered himself as a user and deleted the user within short periods. Since, in practice, deletes driving licence information from the system within a reasonable period of time, the Estonian DPA does not see any violation in this case. Since the complainant's personal data has been deleted by the controller according to the request in a timely manner and the controller has given information regarding the deletion of complainant's personal data, the data processor has met the obligations arising from GDPR Art 17 and Art 12 (3). SA Estonia did not detect any GDPR violations since the situation was caused by a human error mainly because of a misunderstanding and therefore SA Estonia must end the proceedings.

Based on the above, SA Estonia did not detect any violation of data subject's rights and therefore will terminate the proceedings concerning the protection of personal data by

Best regards Estonian DPA