

The President



Examination of the case:

Paris, on **23 AOUT 2019**

Our Ref.: MLD/XD/SGE/DAU/CM192505

Case no. 19005906

(to be referenced in all correspondence)

Dear Mr. Director General,

This is further to the exchanges that took place between the CNIL's services and the Legal department of the [REDACTED] (hereinafter the "[REDACTED]") in the framework of the examination of the complaint of [REDACTED], which was transmitted to the CNIL by the German data protection authority of Saxony-Anhalt pursuant to the provisions of Article 56.1 of the General Data Protection Regulation (GDPR).

[REDACTED] had lodged a complaint with his national data protection authority against the [REDACTED] which would not have granted his objection request to receive direct marketing and his request to obtain access to data concerning him.

Those exchanges lead me, in agreement with other data protection authorities concerned by the processing for direct marketing purposes and for management of customers data purposes, to proceed to the closure of this complaint.

Indeed, in view of the materials submitted, I note that [REDACTED]'s requests have been granted.

I take note that [REDACTED]'s objection request dated July 14th, 2018 has been taken into account by your services on July 19th, 2018. At this time, the complainant's email address has been erased from your direct marketing tools and an unsubscribe confirmation message has been sent to him.

Nonetheless, I would like to draw your attention on the enhancements that must be brought to the unsubscribe process to [REDACTED]'s newsletters.

Indeed, the erasure of data from your systems requires a period of 24 to 48 hours to be effective within your systems.

— RÉPUBLIQUE FRANÇAISE —

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In view of these elements, I invite you to specify in your unsubscribe confirmation messages the existence of such period for requests to be effectively taken into account.

Yours Sincerely,

