

The Chair



Reg. letter no. 2C 127 846 0299 8

Paris, on

References to be quoted in all correspondence:
Our ref.: JDE/ACB/RGL/MDM171026 – CTX-2017-053

Dear Sir,

I refer to the complaint lodged by [REDACTED] with the Netherlands data protection authority, which the latter forwarded to the CNIL pursuant to Article 56.1 of the General Regulation on the protection of personal data. This complaint concerned the complainant's inability to obtain erasure of the geolocation data linked to his account on the [REDACTED] application from [REDACTED]

The CNIL notes that the processing undertaken by [REDACTED] is founded on the contractual basis (article 6(1) (b) GDPR), as it is mentioned in your privacy policy.

Considering that, for the performance of the contract between [REDACTED] and the complainant, the retention of geolocation data is necessary to provide the service offers by [REDACTED] it appears that the deletion of the data required by the complainant was not possible as long as the contract between [REDACTED] and the complainant was undergoing.

To the extent that only the termination of the contract would render possible the deletion of the complainant's geolocation data, it appears that the proposition made by [REDACTED] to the complainant to delete its account was appropriate.

In any case, I note that following exchanges between [REDACTED] and the complainant, he agreed to reset his account so that the data relating to his geolocation would be deleted. I note that this reset occurred on 17 December 2020.

Consequently, I decided to close the procedure related to the aforementioned complaint.

Please do not hesitate to contact the Commission ([REDACTED] [REDACTED]) if you require any further information.

Yours faithfully,

Marie-Laure Denis