Guidelines 01/2022
Data subject rights – right of access

11th of March 2022

TeamViewer

About TeamViewer

TeamViewer is a leading global technology company that provides a connectivity platform to remotely access, control, manage, monitor, and repair devices of any kind – from laptops and mobile phones to industrial machines and robots.

Although TeamViewer is free of charge for private use, it has more than 600,000 subscribers and enables companies of all sizes and from all industries to digitize their business-critical processes through seamless connectivity.

Against the backdrop of global megatrends like device proliferation, automation and new work, TeamViewer proactively shapes digital transformation and continuously innovates in the fields of Augmented Reality, Internet of Things and Artificial Intelligence. Since the company's foundation in 2005, TeamViewer's software has been installed on more than 2.5 billion devices around the world.

The company is headquartered in Goppingen, Germany, and employs around 1,500 people globally. In 2020, TeamViewer achieved billings of EUR 460 million.

TeamViewer AG (TMV) is listed at Frankfurt Stock Exchange and belongs to the MDAX. Further information can be found at www.teamviewer.com.

TeamViewer welcomes the new guidelines, and wish to submit comments to the European Data Protection Board.

Page	Text	Comments
p45 §145	Use of layered approach	In TeamViewer's opinion pseudonymized data should be seen as an appropriate candidate to layered approach. When processing vast amounts of data, the layered approach is indeed the best approach in order to give relevant information to the data subject, and not only a huge list of timestamped events occurring on a server/application. Providing such amount of data will overload the data subject without providing them any benefit. TeamViewer agrees with the opinion expressed in this section 145. Additionally, pseudonymized data may lead to "*apparent difficulties for the data subject to grasp or comprehend the information*" (p.45 point 145), as such data can be used for analytics or statistical purposes, and therefore being present in a company IT system in huge volume.
p10 §32	Providing a paper copy if data subject requests it	In TeamViewer's opinion, a company should always have the option to send back data in an electronic format rather than a paper copy, especially when dealing with a request that requires an extensive response (like providing subsequent data in a layered approach). Other than the volume of data generally held by companies presenting a challenge, a good deal of the data companies process about data subjects may both be unstructured and only machine readable. Providing such information in print would subsequently not only be non-feasible but also unhelpful to the data subject as interpretation would be hugely difficult. Printing it on paper typically provides limited benefits to the data subject (there being no easy way to manipulate or transfer the data between services and

		devices), non-environmentally friendly, and involves increased risks of breaches, especially if the Data Subject request data previously covered by a layered approach. Sending the data back by electronic means is easier for all the parties (easier to generate, and easier to reuse), and provides heightened security. Alternatively, where the provision of a paper copy would be 'manifestly unfounded or excessive' the company should be able to offer the provision of the data for free by electronic means and absorb the cost, or to provide the data in a paper format at the minimum reasonable cost to be borne by the subject. This would additionally match the spirit of the proportionality provisions under art 12(5) GDPR.
p35 §108	Data in the backups	In TeamViewer's opinion there is no benefit for the data subject to also be provided previous versions of the data in addition, as such data will be predominantly inaccurate and not up to date. Backups are reflection of the then current live system. They will therefore be out of date compared to live data, covered in any event under a DSR.
p22 §54	Request sent to a non-reply address	In TeamViewer's opinion, the EDPB should state clearly that requests coming through such channels are not considered valid requests. Where an appropriate channel has been set and the channel to which the request was sent is clearly marked as 'no reply' TeamViewer's view is that this channel should not be an appropriate route to receive and respond to data subject requests. The emails sent to a no-reply addresses are generally not stored and or processed. Any request coming through such channel is therefore lost and can't be answered from a technical standpoint. TeamViewer recognises however that data subject must be able to easily understand that an email address is not designated for a certain type of request. In TeamViewer's view this should be tempered by a requirement that messages to 'no reply' emails should receive an

		automatic reply directing the subject to a mailbox which is monitored.
p26 §71 to 76	Authentication of the requester	TeamViewer provides a free version of some of its products. When a user creates an account in TeamViewer products, the minimum information needed is an e-mail address and password. TeamViewer seek no additional information, as it is not needed to use its products. This decision is a deliberate effort to align with the principle of data minimisation. In TeamViewer's opinion, there is no way of easily certify the identity of the data subject in regard to the information stored in production systems under an email address. Adding to that, TeamViewer has very limited amount of personal data that is stored in systems: (no billing information eg.). Therefore, considering that a request coming from an authenticated user as valid, would seem a proportionate measure of authentication (e.g. a request made via our software while being connected to it, or with MFA). Also, in TeamViewer opinion the EDPB should state that (attempting to) decrypt encrypted user data to collect information in an attempt to identify the data subject is disproportionate.

TeamViewer Germany GmbH
Bahnhofsplatz 2
73033 Göppingen