

Public Consultation regarding the creation of a mandatory user account on an e-commerce website.

The creation of an account provides the following benefits for the customer and for the ecommerce seller:

- Track an order and make a claim if necessary
- Ease a commercial relationship
- Ask for a refund if necessary
- Verify the identity of the customer to guarantee fraud prevention, identity theft (to be sure that the order is placed by the right customer and not by a hacker)
- Benefit for special discounts/conditional purchase reserved to a group of customers completing certain criteria: number of participants to a specific event, professional network, etc.
- Fulfilling billing and fiscal obligations and be able to give all the required information to the competent authority in France
- Preventing identity theft and ensure that the purchase is made by the right person
- Build long-term relationships with clients
- Fraud prevention

Even though you consider that account creation is not mandatory for a one-shot purchase, neither the customer nor the e-commerce seller can know whether it is going to be one-shot or if the new customer will become a loyal customer.

I think that instead of preventing e-commerce sellers from asking their clients, customers or users of the platform, to create an account before concluding a purchase and paying, it would be advisable that ecommerce sellers collect and process only the data necessary to fulfill the specified purposes and to ask for customer's consent when they want to push advertising or make a profile. Data Protection Authorities can follow the bad/good practices developed by ecommerce sellers. There is no reason that all ecommerce sellers pay for the mistakes made by some of them.

Transparency is the key to customer data processing and to the creation of an account in an ecommerce platform.