



25 April 2024

Final Decision

Complaint against [REDACTED] – Data Transfers outside the EU / use of Google Analytics

IMI entry numbers: A56ID 562056 / Case 583164 / A60DD 620327

The Hessian Commissioner for Data Protection and Freedom of Information (hereinafter “HBDI”) refers to the complaint lodged by [REDACTED] (hereinafter “data subject”) against [REDACTED] (hereinafter “controller”) with the French Data Protection Authority concerning data transfers outside the European Union and the use of Google Analytics.

1. Case Description

On 31 March 2023, the data subject lodged a complaint with the French Data Protection Authority in which the data subject stated that the controller is transferring personal data outside the European Union by the use of Google Analytics on its website [REDACTED]. The complaint was forwarded to the HBDI via IMI on 28 September 2023.

2. Investigation Outcome

On 18 January 2024, the French website of the controller was checked by HBDI. The controller appears to use Google Analytics, but an opt-in is required for this. Further, the use of Google Analytics and corresponding data transfers outside the European Union are meanwhile covered by the EU-US Data Privacy Framework, which was adopted on 10 July 2023.

Unfortunately, it is not possible to check an older version of the French website of the controller. Only a copy of the website from February 2020 is available from the Internet Archive, but this indicates that the domain belonged to a different controller at the time.

3. Decision

On 21 March 2024 the HBDI submitted a Draft Decision (A60 DD 620327) and announced to close the case without further action. The Supervisory Authorities concerned raised no objections to the Draft Decision. The HBDI therefore submits this Final Decision and closes the file.