

Purpose:

To provide micro- and small organisations with a harmonised method to document unsubscribe requests, especially when technical limitations may prevent correct receipt or detection of such requests.

1. Organisation Details

- Organisation name:
 - Contact e-mail for rights requests:
 - Standard unsubscribe information included in each mailing: link + alternative method.
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2. Unsubscribe Options Provided to the Recipient

- ✓ Unsubscribe link in footer
 - ✓ “List-Unsubscribe” header (mailto / HTTPS)
 - ✓ Alternative method: reply with keyword “UNSUBSCRIBE”
 - ✓ Non-click method for clients that block links (relevant because many clients block link-clicks or split URLs, as observed in real cases).
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3. Technical Limitations Affecting Unsubscribe Delivery

Organisations document the following risks (all real and evidenced in practice):

3.1 SMTP limitations

- SMTP provides **no delivery guarantee**.
- Messages may be lost due to routing, spam filters, server errors or mailbox quotas.
- Unsubscribe requests may therefore never reach the organisation despite correct user intent.

(In real cases, no unsubscribe e-mail was ever found due to these causes.)

3.2 Client-side limitations

- Business email clients frequently **block link-clicks** or break URLs (Outlook).
- Security warnings discourage clicking any links.

Therefore, recipients often choose alternative methods, such as replying with “UNSUBSCRIBE”.

3.3 Mailbox behaviour

– Spam folders can delete messages after 30 days automatically (e.g. Gmail) – unsubscribe requests disappear without trace.

4. Internal Verification Steps (when a complaint arises)

The organisation documents that it has:

- ✓ checked inbox and spam folders
 - ✓ reviewed server logs (if available)
 - ✓ verified whether any unsubscribe message was received
 - ✓ recorded that **no unsubscribe request was found**
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5. Actions Taken if an Unsubscribe Request *Is* Received

- Immediate removal of the address
 - Optional confirmation to the requester
 - Logging: date/time, method, action taken, and relevant header or log information
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6. Actions Taken if *No* Request Was Received

- Documenting that no message was present in any mailbox
 - Providing a technical explanation (spam deletion, delivery failure, SMTP uncertainty)
 - Offering the complainant an alternative way to unsubscribe immediately
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7. Preventive Measures

- ✓ Shorter unsubscribe URLs
- ✓ Plain-text “reply UNSUBSCRIBE”

- ✓ Daily spam-folder checks
 - ✓ Testing unsubscribe functionality regularly
 - ✓ Providing a phone number/form as backup
 - ✓ Documenting all steps in this template
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8. Compliance Statement

The organisation confirms that all reasonable technical and organisational measures were taken to enable unsubscribe requests, but cannot guarantee receipt due to limitations inherent to SMTP, email clients and spam-filtering systems.

This template ensures transparency and proportionality, and helps MSMEs demonstrate compliance in a harmonised way across the EU.