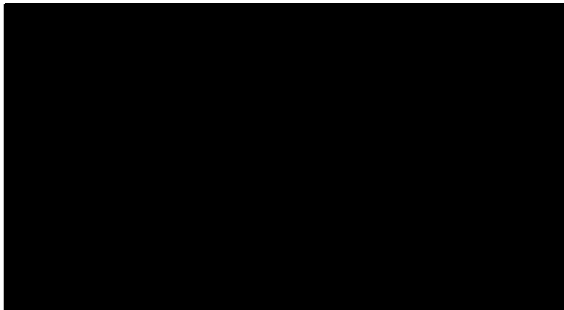


Registered letter with acknowledgement of receipt



Paris, August 25th, 2025

Dear Chief Executive Officer,

I am responding to the complaint sent by the Dutch Data Protection Authority pursuant to the provisions of Article 56.1 of the General Regulation on the Protection of Personal Data ("GDPR").

The complainant, [REDACTED], holder of the telephone number [REDACTED] lodged a complaint with his national data protection authority against the company [REDACTED] established in France, concerning the difficulties encountered in exercising his right of access.

In particular, the complainant stated that he had been canvassed on his private telephone line by an entity that had learned of his details through the [REDACTED] extension. Following this, the complainant exercised his right of access and deletion with [REDACTED]. In response, the company confirmed that it had deleted the complainant's personal data and stated that it had collected them on the legal basis of legitimate interest. The company also stated that it had collected the complainant's data online.

As you know, following an inspection procedure in June 2022, the CNIL's restricted committee considered that [REDACTED] had failed to comply with several obligations set out in the General Data Protection Regulation ("GDPR"). In particular, it considered that :

- the collection by [REDACTED] of contact details for which [REDACTED] users had expressly limited visibility [REDACTED] exceeded what could reasonably be expected of people registering on a [REDACTED] social network. It therefore considered that the contact details had been collected unlawfully (article 6 of the GDPR);
- the company's delay in informing individuals about the collection of their data, and *even more so* by sending an email in English, did not provide transparent and comprehensible information (Articles 12 and 14 of the GDPR);
- [REDACTED] response to the data subjects' requests for right of access was insufficient in the light of Article 15 of the GDPR.

As a result, the restricted group imposed an administrative fine [REDACTED] on [REDACTED] for all of these breaches, and enjoined the company, within a period of 6 months, to :

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- cease collecting the data of people who have chosen to limit the visibility of their contact details, and delete the contact data collected in this way or, failing that, if it is impossible to distinguish this data whose visibility has been limited from other data, inform them within 3 months of the processing of their data and of the possibility of objecting to it, and use the data solely for this purpose;
- inform the people whose data is collected in a language they understand;
- respond to requests for access from individuals in accordance with the provisions of Article 15 of the RGPD by providing them with all the information it has on the sources from which the data is collected .¹

In the light of these elements, the CNIL, in agreement with the other European data protection authorities, has no doubt that [REDACTED] will take the appropriate measures to comply with [REDACTED] request for right of access, in particular with regard to the sources of data collection in accordance with the aforementioned injunction, and is therefore closing this complaint.

I would nevertheless like to point out that the CNIL reserves the right to use all the powers granted to it by the GDPR and by the amended Act of 6 January 1978 in the event of further complaints.

Yours sincerely,

[REDACTED]

[REDACTED]