

Dear Sir or Madam,

I am writing in response to the email exchange between the services of the French Data Protection Authority (CNIL) and the Data Protection Officer of the company [REDACTED], in connection with the investigation of the complaint forwarded to us by the Spanish data protection authority, pursuant to the provisions of Article 56(1) of the General Data Protection Regulation (hereinafter “GDPR”).

The complaint concerned the difficulties encountered by [REDACTED] in exercising her right of access to her personal data, in the context of which she wished, in particular, to ascertain the origin of the collection of her data, given that she had never previously corresponded with your company.

Indeed, [REDACTED] states that she received a letter from the company [REDACTED], offering her services to help her recover a sum of money deposited in a financial institution in the United States by her late husband.

In this regard, during the investigation of this complaint, the company [REDACTED] stated:
1) that it had never received the request for access rights from [REDACTED], thereby explaining the lack of a response to it;

2) that it was tasked with locating and contacting the beneficiaries of [REDACTED];

3) that, in this context, it had obtained from the Civil Registry a copy of the deceased’s death certificate, which specified the deceased’s marital status, his last known address and the name of the person who reported the death (in this case, the deceased’s father-in-law);

4) that, in this context, the Civil Registry was asked to verify whether the deceased had been married and that a copy of the deceased’s marriage certificate was provided;

5) having looked up the contact details of [REDACTED] in the telephone directory and having written to her to offer her services.

I further note that following the last contact with the father of [REDACTED], who declined the commercial proposal from [REDACTED] the company did not contact the complainant again and no further action was taken on this matter.

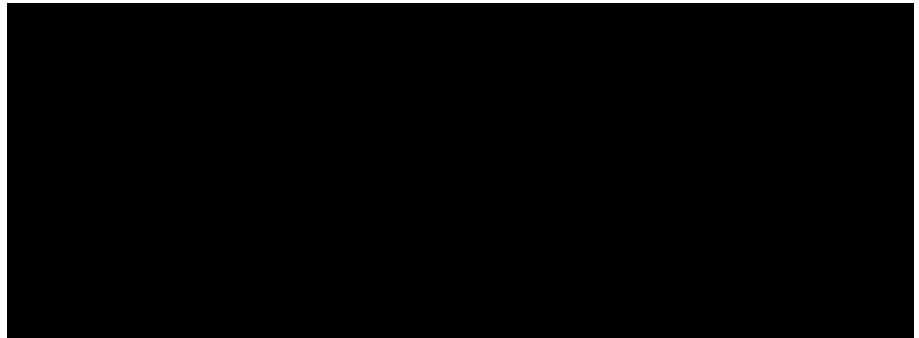
It is clear from the investigation and the comments of the data controller that the information requested by the complainant regarding the origin of the data concerning her has thus been provided by [REDACTED]

This complaint should therefore be closed pursuant to Article 60(7) of the GDPR.

The CNIL reserves the right, however, in the event of further complaints, to exercise all the powers conferred upon it by the provisions of the GDPR and the amended Law No. 78-17 of 6 January 1978 on data processing, files and freedoms.

Yours faithfully,

On behalf of the President of the CNIL, and by delegation,



Subject to the applicants having standing to bring proceedings, the CNIL's decisions may be appealed to the Council of State within two months of their notification, extended:

- one month for people residing in Guadeloupe, French Guiana, Martinique, Réunion, Saint Barthélemy, Saint Martin, Mayotte, Saint Pierre and Miquelon, French Polynesia, the Wallis and Futuna Islands, New Caledonia and the French Southern and Antarctic Territories;*
- two months for people residing abroad.*