



REPUBLIC OF ESTONIA
DATA PROTECTION INSPECTORATE

/*FOR INTERNAL USE

Holder of information: Data Protection Inspectorate

Notation made: 17.10.2025

The access restriction shall be valid until: 17.10.2100,

Legal ground: AvTS § 35 lg 1 p 12, AvTS § 35 lg 1 p 2 *

Re p 2 – until entry into force of the Final Decision

Lithuanian SA

Ours 17.10.2025

Art 60 Final Decision

Termination of proceedings

Estonian Data Protection Inspectorate (DPI) received a complaint via the cross-border procedure system from a Lithuanian citizen [REDACTED] (the Complainant), stating that [REDACTED] (the Controller, [REDACTED]) did not properly respond to the Complainant's General Data Protection Regulation (GDPR) Article 15 request. The Complainant submitted his request to the Controller on 28 April 2025, specifically asking for details about [REDACTED]'s decision to permanently block Complainant's driver account. The Complainant also wished to know whether the decision was made automatically or reviewed by a human. The responses received from [REDACTED] were general in nature and lacked information about human involvement in the decision-making process.

Since [REDACTED] is an Estonian company whose management board is in Estonia and all decisions concerning data processing are taken in Estonia, the Estonian DPI agreed to be the lead supervisory authority in the case and commenced supervisory procedures based on the complaint. On 26 June 2025 DPI forwarded the Complainant's inquiry to [REDACTED], requesting that they respond to the Complainant no later than on 7 July 2025 and send a copy of the response to DPI. [REDACTED] provided a detailed response to the Complainant on 26 June 2025 and stated their willingness to continue responding to further inquiries. In the response [REDACTED] also clarified that the decision to block the account was not based solely on automated processing (within the meaning of GDPR Article 22), but was manually reviewed by a human.

[REDACTED] explained to DPI that the Complainant did not receive a thorough response initially due to an oversight by a customer service representative and that the failure to respond properly was due to human error. [REDACTED] has implemented appropriate measures to prevent such issues from recurring, ensuring that customer support staff are properly trained. [REDACTED] is committed to continuing the training of the customer support department and other relevant departments to ensure that data subject requests are handled correctly.

Pursuant to Article 15(1) of the GDPR, the data subject has the right to obtain from the controller confirmation as to whether their personal data are being processed and, if so, they have the right to access their personal data and the information listed in Article 15(1) of the GDPR. The controller must, pursuant to Article 12(3) GDPR, respond to the data subject's request without undue delay, but not later than within one month. That period may be extended by two months where necessary, taking into account the complexity and number of the request. The controller shall inform the data subject of any such extension and of the reasons for the delay within one month of receipt of the request. Upon request, the individual must also be provided with adequate and relevant

explanations regarding the data processing (Articles 12 and 13 of the GDPR). Pursuant to Article 22(1) of the GDPR, the data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

In this case the Complainant's request to receive information was submitted on 28 April 2025 and the detailed response was sent to him by the Controller on 26 June 2025. The delay was caused by human error, e.g. the customer service representative did not recognize the Complainant's request as a GDPR Art 15 request. The decision was not based solely on automated processing. The Controller has acknowledged their mistake and is willing to reply to the Complainant's further requests, should there be any.

As the violation has been resolved, **DPI closes the proceedings in this matter.**

The Controller's reply to the Complainant has been added to Relevant Documents.

This notice of termination of the supervision proceedings can be challenged within 30 days by submitting an appeal to the administrative court under the Code of Administrative Court Procedure.¹

Respectfully



lawyer
authorized by Director General

¹ [Code of Administrative Court Procedure–Riigi Teataja](#)