In the matter of the General Data Protection Regulation

DPC Complaint Reference: [redacted]

In the matter of a complaint, lodged by [redacted] **with the Data Protection Commission pursuant to Article 77 of the General Data Protection Regulation, concerning Google Ireland Limited**

Record of Amicable Resolution of the complaint and its consequent withdrawal pursuant to Section 109(3) of the Data Protection Act, 2018

Further to the requirements of EDPB Guidelines 06/2022 on the practical implementation of amicable settlements Version 2.0 (adopted on 12 May 2022)

RECORD OF AMICABLE RESOLUTION FOR THE PURPOSE OF EDPB GUIDELINES 06/2022 ON THE PRACTICAL IMPLEMENTATION OF AMICABLE SETTLEMENTS VERSION 2.0, ADOPTED 12 MAY 2022

Dated the 29th day of December 2025

An Coimisiún um Chosaint Sonraí
Data Protection Commission

Data Protection Commission
6 Pembroke Row
Dublin 2, Ireland

Background

1. On 19 February 2025, [redacted] ("the **Data Subject**") lodged a complaint pursuant to Article 77 GDPR with the Data Protection Commission ("the **DPC**") concerning Google Ireland Limited ("the **Respondent**").

2. The DPC was deemed to be the competent authority for the purpose of Article 56(1) GDPR.

The Complaint

3. The details of the complaint were as follows:

    a. The Data Subject submitted an access request pursuant to Article 15 GDPR following the loss of access to their account.

    b. The Data Subject was not satisfied with the response received from the Respondent and accordingly lodged a complaint with the DPC.

Action taken by the DPC

4. The DPC, pursuant to Section 109(4) of the Data Protection Act 2018 ("the **2018 Act**"), is required, as a preliminary matter, to assess the likelihood of the parties to the complaint reaching, within a reasonable time, an amicable resolution of the subject matter of the complaint. Where the DPC considers that there is a reasonable likelihood of such an amicable resolution being concluded between the parties, it is empowered, by Section 109(2) of the 2018 Act, to take such steps as it considers appropriate to arrange or facilitate such an amicable resolution.

5. Following a preliminary examination of the material referred to it by the Data Subject, the DPC considered that there was a reasonable likelihood of the parties concerned reaching, within a reasonable time, an amicable resolution of the subject matter of the complaint. The DPC's experience is that complaints of this nature are particularly suitable for amicable resolution in circumstances where there is an obvious solution to the dispute, if the respondent is willing to engage in the process. In this regard, the DPC had regard to:

    a. The relationship between the Data Subject and Respondent (being, in this case, an individual and a service provider); and

    b. The nature of the complaint (in this case, an unsuccessful attempt by the Data Subject to exercise their data subject rights).

6. While not relevant to the assessment that the DPC is required to carry out pursuant to Section 109(4) of the 2018 Act, the DPC also had regard to EDPB Guidelines 06/2022 on the practical implementation of amicable settlements Version 2.0, adopted on 12 May 2022 ("**Document 06/2022**"), and considered that:

a. the possible conclusion of the complaint by way of amicable resolution would not hamper the ability of the supervisory authorities to maintain the high level of protection that the GDPR seeks to create; and that

b. such a conclusion, in this case, would likely carry advantages for the Data Subject, whose rights under the GDPR would be vindicated swiftly, as well as for the controller, who would be provided the opportunity to bring its behaviour into compliance with the GDPR.

Amicable Resolution

7. The DPC engaged with both the Data Subject and Respondent in relation to the subject matter of the complaint. The DPC formally commenced this complaint on 15 August 2025. The DPC wrote to the Respondent providing it with a summary of the complaint along with the supporting correspondence, as provided to the DPC. In the same correspondence, the DPC asked the Respondent to review the Data Subject's account and to address their concerns raised as part of this complaint, in relation to a copy of their data.

8. Responding to the DPC, the Respondent explained that it had conducted an internal review of the account and it appeared that the Data Subject's account was not disabled; however, the Data Subject was having difficulties with gaining access to the account. The Respondent advised the DPC that, on foot of its review of the Data Subject's account, it had reached out to the Data Subject. The Respondent noted that the Data Subject should have received direct correspondence from a specialist team from within the Respondent Controller, offering to provide further assistance to the Data Subject with account recovery. The Respondent further confirmed to the DPC, that according to the information available to the Respondent, the Data Subject has subsequently successfully accessed their account and their account is active without any restrictions.

9. Following the DPC's engagement with the Respondent, the DPC wrote to the Data Subject providing them with a summary of the correspondence received from the Respondent along with copies of the direct correspondence, as shared by the Respondent. In its correspondence to the Data Subject, the DPC noted that the Respondent had confirmed that the Data Subject had successfully accessed their account and as such, a set of self-service tools were now available to the Data Subject so that they might access and download a copy of their data themselves. The DPC further noted that the requested personal data now having been made available to the Data Subject by the Respondent, the dispute between the Data Subject and the Respondent appeared to have been resolved. In the circumstances, the DPC asked the Data Subject to notify it, within a specified timeframe, if they were not satisfied with the outcome, so that the DPC could take further action. The DPC did not receive any further communication from the Data Subject and, accordingly, this complaint has been deemed to have been amicably resolved.

10. In circumstances where the subject matter of the complaint has been amicably resolved, in full, the complaint, by virtue of Section 109(3) of the 2018 Act, is deemed to have been withdrawn by the Data Subject.

Confirmation of Outcome

11. For the purpose of Document 06/2022, the DPC confirms that:

    a. The complaint, in its entirety, has been amicably resolved between the parties concerned;

    b. The agreed resolution is such that the object of the complaint no longer exists; and

    c. Having consulted with the supervisory authorities concerned on the information set out above, as required by Document 06/2022 the DPC has now closed off its file in this matter.

12. If dissatisfied with the outcome recorded herein, the parties have the right to an effective remedy by way of an application for judicial review, by the Irish High Court, of the process applied by the DPC in the context of the within complaint.

Signed for and on behalf of the DPC:



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Deputy Commissioner

Data Protection Commission