Private & Confidential

In the matter of the General Data Protection Regulation

DPC Complaint Reference: [redacted]

IMI Reference: [redacted]

In the matter of a complaint, lodged by [redacted] **with the Berliner Beauftragte für Datenschutz und Informationsfreiheit (Berlin DPA) pursuant to Article 77 of the General Data Protection Regulation, concerning Riot Games 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 ON 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 10 July 2024, [redacted] ("the **Data Subject**") lodged a complaint pursuant to Article 77 of the GDPR with the Berliner Beauftragte für Datenschutz und Informationsfreiheit ("the **Recipient SA**") concerning Riot Games Limited ("the **Respondent**").

2. In circumstances where the Data Protection Commission ("the **DPC**") was deemed to be the competent authority for the purpose of Article 56(1) of the GDPR, the Recipient SA transferred the complaint to the DPC on 12 September 2024.

The Complaint

3. The details of the complaint were as follows:

    a. The Data Subject contacted the Respondent on 4 May 2024 requesting erasure of their account, and all personal data associated with it, from the Respondent's platform.

    b. In its response, the Respondent advised the Data Subject that in order for it to proceed with the erasure request, the Data Subject will need to provide additional information by answering a number of questions to prove their ownership of the account.

    c. The Data Subject complied with the request and provided the necessary information. However, in a follow up correspondence, the Respondent advised the Data Subject that it was not able to verify that the Data Subject was the owner of the account, and therefore, it would not be able to proceed with the deletion request.

    d. As the Data Subject was not satisfied with the response received from the Respondent, they lodged a complaint with the Recipient SA.

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 Recipient SA, 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 (via the Recipient SA) and Respondent in relation to the subject matter of the complaint.

8. Further to that engagement, on 27 May 2025, the Respondent advised the DPC that the Data Subject had initiated the account recovery process and not an account deletion process as indicated by the Data Subject. Being unable to do so, the Data Subject contacted their support desk and asked for their account to be deleted and generating an account recovery ticket.

9. The agent then followed the Respondent's procedures to try to authenticate the user as the rightful owner of the account, but the information submitted by the Data Subject was not sufficient for identification in this case. Following this, the agent then sent the Data Subject a link to the correct workflow to achieve account deletion, which required the user to be logged-in to proceed. The Data Subject did not use this option.

10. The Respondent clarified that the Data Subject refused to provide answers to the initial five questions in order to confirm their identity, and failed to answer the further twenty-three follow up questions, which in turn raised concern over the ownership of the account and prevented the deletion.

11. The Respondent clarified that had the Data Subject provided the Respondent with the required information initially, the agent would have then proceeded with the deletion of the account without the need for further follow up questions. However, with a view to reaching an amicable resolution, the Respondent advised that it was prepared to delete the Data Subject's account if the Data Subject contacts them from the email address registered with

the account. Alternatively, Respondent provided the DPC with a link to the automatic deletion facility, using the dedicated tool on the Respondent's should they wish to delete the account themselves.

12. On 30 May 2025, the DPC's letter outlining the position of the Respondent as part of the amicable resolution process issued to the Recipient SA for onward transmission to the Data Subject. This correspondence requested that the Data Subject notify the DPC within a specified timeframe, if they were not satisfied with the action taken by the Respondent, so that the DPC could investigate the matter further. The Recipient SA issued this letter to the Data Subject on 18 June 2025.

13. The Data Subject responded directly to the DPC on 30 June 2025. In their correspondence, the Data Subject stated that they tried to use the URL provided by the Respondent to delete their account but were unable to achieve deletion in this particular case as the system did not allow them to proceed. The error message was directing the Data Subject to contact the Respondent's customer support in this case. The Data Subject provided a screenshot of the error message they were getting when trying to use the deletion tool so that the DPC could investigate the matter further. Following this, the DPC corresponded further with the Respondent regarding its proposal.

14. On 15 July 2025, the Respondent provided a further response to the DPC's queries, and explained that following further investigation, they could confirm that this particular account contained rare or high-value content. For such accounts, deletion cannot be completed via the automated flow, and must be handled manually by its support agents.

15. The Respondent outlined that this safeguard is in place to prevent accidental or malicious deletion of high-value accounts, again reflecting its commitment to security and accountability. This technical limitation meant that, even if the user had successfully navigated the correct flow, deletion would still not have been finalised without agent intervention. The Respondent confirmed that in light of the above, and in the interest of swiftly resolving the Data Subject's request, it was prepared to proceed with deletion of the account manually without further verification, provided the Data Subject confirms their continued wish to delete the account.

16. Following this, the DPC corresponded further with the Data Subject and sought confirmation from them that they still wish to proceed with the account deletion given the circumstances as per the Respondent's latest response. On 12 August 2025, the Data Subject provided a replied and confirmed that they still wish to proceed with the deletion of the account. Having received the explicit confirmation from the Data Subject, the DPC corresponded with the Respondent. On 15 August 2025, the Respondent confirmed to the DPC that the account in question was now deleted.

17. On 17 September 2025, the DPC's letter outlining the action taken by the Respondent as part of the amicable resolution process issued to the Recipient SA for onward transmission to the Data Subject. This correspondence requested that the Data Subject notify the DPC within a

specified timeframe, if they were not satisfied with the action taken by the Respondent, so that the DPC could investigate the matter further. The Recipient SA issued this letter to the Data Subject on 1 October 2025.

18. On 3 November 2025, the Recipient SA confirmed to the DPC, that no response had been received from the Data Subject.

19. On 12 November 2025, and in light of the foregoing, the DPC wrote to the Recipient SA noting that the DPC considered the complaint to have been amicably resolved and withdrawn in accordance with section 109(3) of the Act and that it would conclude the case and inform the Respondent.

20. 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

21. 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.

22. 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