



## **Report on EU Data Protection Authorities**

### Part 3: Received Complaints

Deloitte Privacy Services – Privacy Response

# Report on EU Data Protection Authorities

## Introduction

On 25 May 2019 the General Data Protection Regulation (“GDPR”) celebrated its first anniversary and once more all eyes are turned towards the national **Data Protection Authorities** (“DPAs”).

The **DPAs are facing busy times**. Whilst their primary task is to enforce the application of the GDPR and ensure compliance, the GDPR entrusts the DPAs with a number of additional tasks. They are responsible for awareness, guidance, handling complaints and conducting investigations – to name just a few of their tasks.

In some circumstances, the **GDPR also requires organizations to actively** work with their DPA(s). Organizations must, for example, cooperate in investigations, consult their relevant DPA for certain high-risk Data Protection Impact Assessments (“DPIAs”), obtain DPA approval for Binding Corporate Rules (“BCRs”) and report certain personal data breaches within 72 hours.

It is therefore important for organizations to not only identify which DPAs they may need to engage with in the future, but also develop their knowledge on the characteristics of these DPAs. Some organizations may consider establishing a working relationship with their DPA(s), to ensure smooth communication in times of need.

At Deloitte we understand these needs. We have therefore conducted **extensive research** into certain key characteristics of the DPAs. The research seeks to paint a detailed picture and to provide you with a closer look at factors that may influence a DPA’s way of working. Some key topics include data breach reporting, resources, guidance issued and enforcement actions taken.

The results of our research are published in a number of sub-reports. A comprehensive final report will be made available once all sub-reports have been published.

In this edition we present our findings on **the complaints submitted to DPAs**.

# Received Complaints

## Introduction



# Received Complaints

## The individual in the driver's seat

Individuals (or their representatives) have a right to lodge a complaint with their DPA. They may be motivated to do so if they feel their data protection rights have been breached or if they disagree with an organization's processing activities. The DPAs must handle complaints lodged and inform the complainant of the progress and outcome of any potential investigation.

The number of complaints submitted provides insight into the level of privacy awareness within the EU and how easy it has become to submit a complaint. The type of complaints may also provide an indication of the level of compliance within a market and may be useful data for DPAs to consider when determining what investigations and enforcement actions they will undertake. It is therefore important that organizations understand the implications complaints can have on their business.

Some DPAs publicized how many complaints they received in 2018. Based upon these publications, this report provides an overview of the number of complaints submitted across the EU. Where such data was available, it also presents how this evolved over the last three years.

The comparison of this data is somewhat challenging, however. At present, there is no harmonized definition of a complaint amongst DPAs, nor is there a harmonized approach on how to collect this data. While some DPAs explicitly state the number of complaints received in their reports, other DPAs also include all contact with individuals in their numbers (regardless of whether it is a complaint). Numbers may thus vary depending on local variations in the definition of a complaint.

Despite these differences, this report shows a clear increase in the number of complaints submitted across Europe, which may be a result of the GDPR. To fully assess the impact of the GDPR, it will be interesting to further track the developments around complaints submitted in 2019 and the years to follow.

# Received Complaints

## Key findings



# Key findings on received complaints

## Prepare yourself - Individuals are increasingly submitting complaints!

Surprisingly, our findings show that despite the importance of strengthening rights of individuals and their right to lodge a complaint, DPAs across the EU do not yet have a harmonized approach regarding the definition of a complaint. While some DPAs explicitly state the number of received complaints in their reports, others DPAs include all contact with individuals in their numbers (regardless of whether it is a complaint) or do not specify a definition at all.

Despite these differences, our analysis of DPA reports shows a clear increase in the number of complaints submitted, since the GDPR entered into force, some examples of which have been highlighted below.

Between 2016 and 2018 the most significant **increase in complaints** was seen in Austria and Denmark. Austria saw an increase from 180 to 1,036 and Denmark from 1,673 to 5,515. The number of complaints submitted in **Ireland** also more than doubled from 1,479 in 2016 to 4,113 in 2018.

In **Bulgaria**, the number of complaints submitted showed a decrease from 571 in 2016 to 480 in 2017, but increased more considerably to 784 in 2018.

The number of complaints submitted to the **UK's** DPA shows the smallest increase from 2016 – 2018 (12%).

**The Netherlands** is the country with the **highest number** of complaints submitted in 2018. This number increased by about a third with reference to 2016 (30%).



## Key findings on received complaints (contd.)

**France's** DPA received the second highest number of complaints in 2018 compared to the other countries. The increase of received complaints with 44% between 2016 – 2018 was slightly more significant than the increase in the Netherlands.

It is likely that if all complaints submitted to the German DPAs are added, the highest number of complaints was submitted in Germany. However, due to the fragmentation of DPAs (there are 16 state-run DPAs and one federal DPA) in **Germany**, it is difficult to give a correct estimation of the number of complaints. What is clear though, is that the number has increased for all German DPAs.

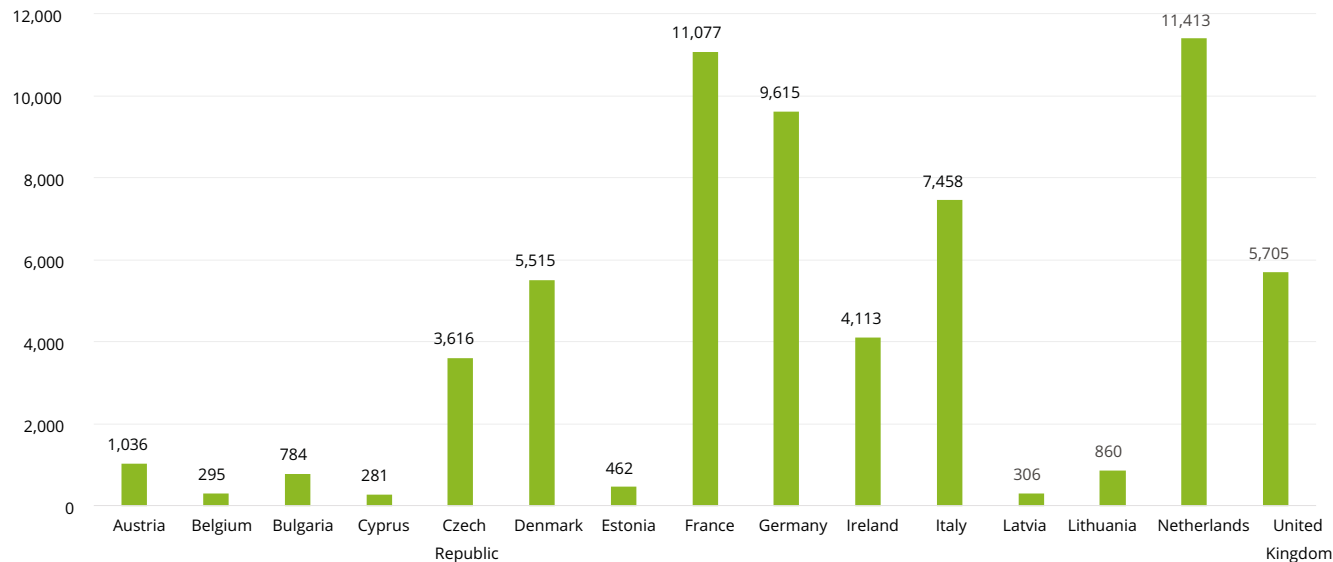
The fact that **the number of complaints increased in all countries included in the scope of this report** shows that individuals are not only more aware of their data protection rights, but that they are increasingly active in exercising their rights by submitting complaints with the relevant DPA. Therefore, it is important that organizations are aware of this trend and prepare themselves for possible action of the DPAs.

The following pages focus on a number of countries where clear information regarding complaints of individuals was available.



# Total number of reported complaints in 2018\*

## Based on reports from local Data Protection Authorities

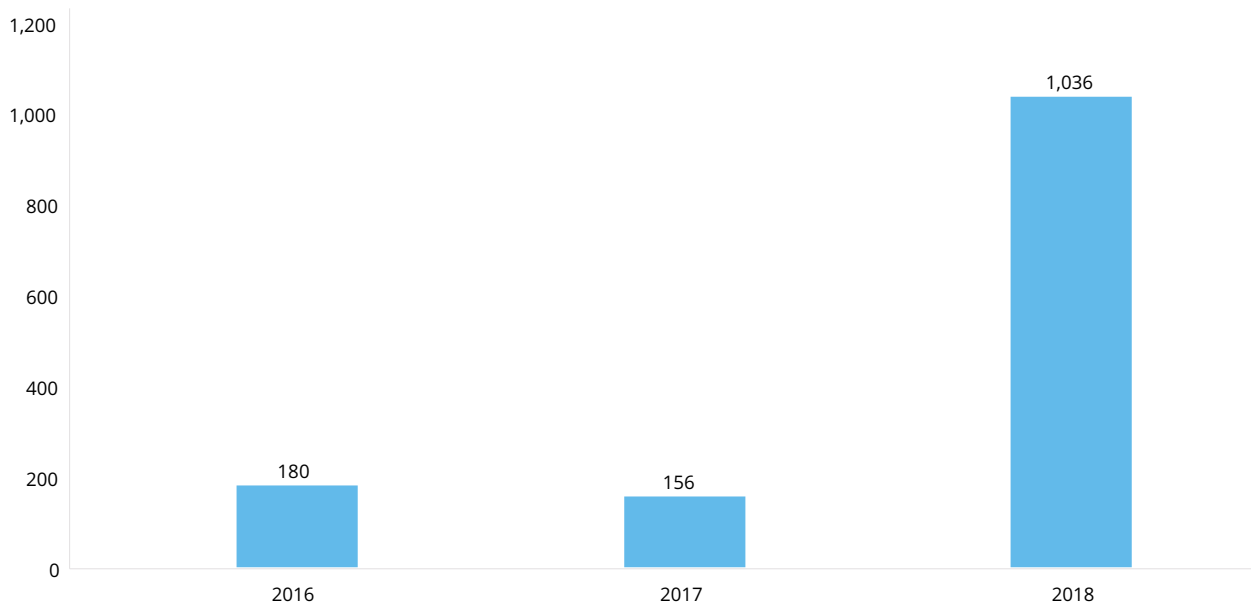


\* The number of complaints reported in this graph for Germany refers to complaints received by the Federal DPA. Please note that there is no standard definition for "complaints", numbers may thus vary.



# Austria

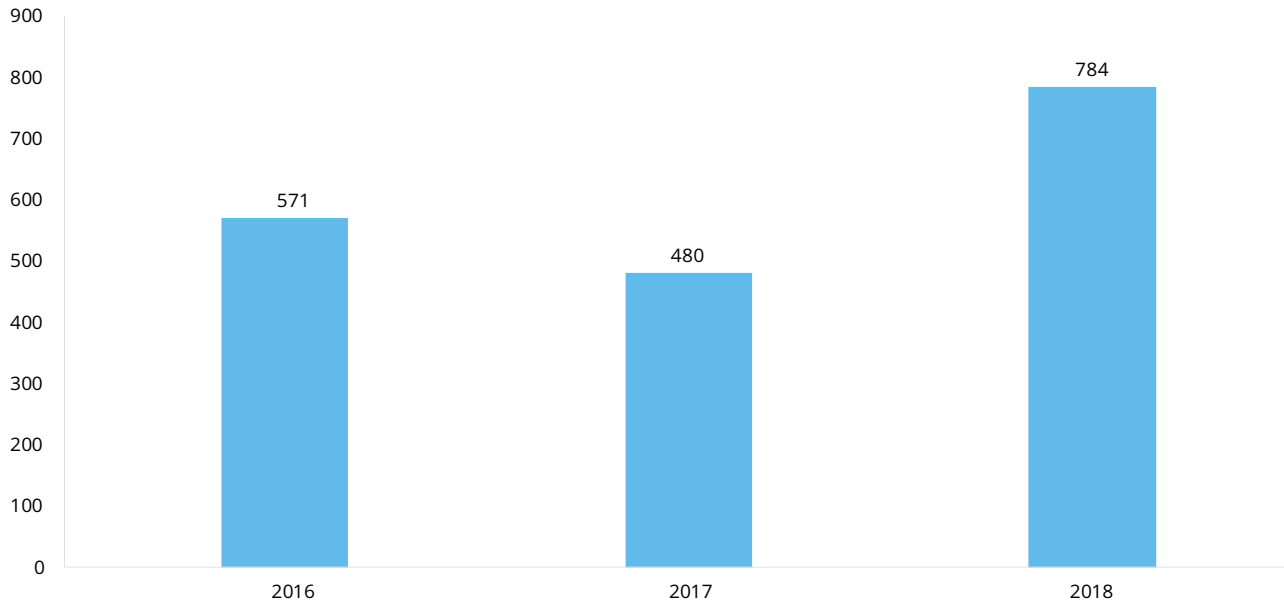
## Number of complaints in the years 2016-2018



The Austrian DPA does not specify what constitutes a "Complaint".

# Bulgaria

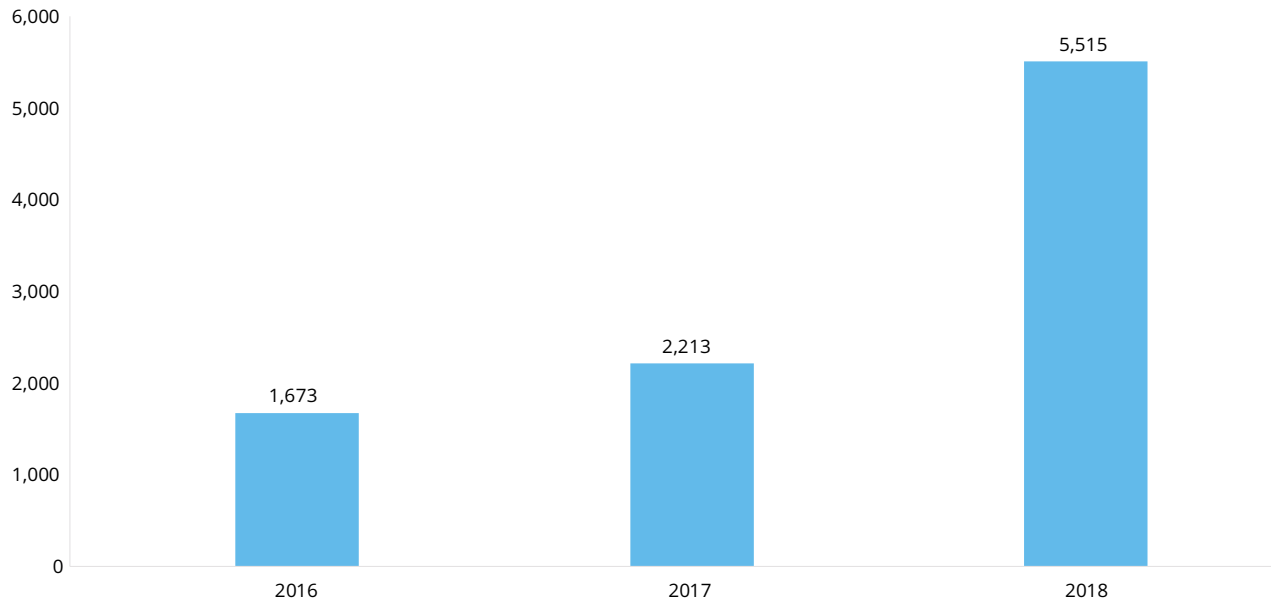
## Number of complaints in the years 2016-2018



The Bulgarian DPA does not specify what constitutes a "Complaint".

# Denmark

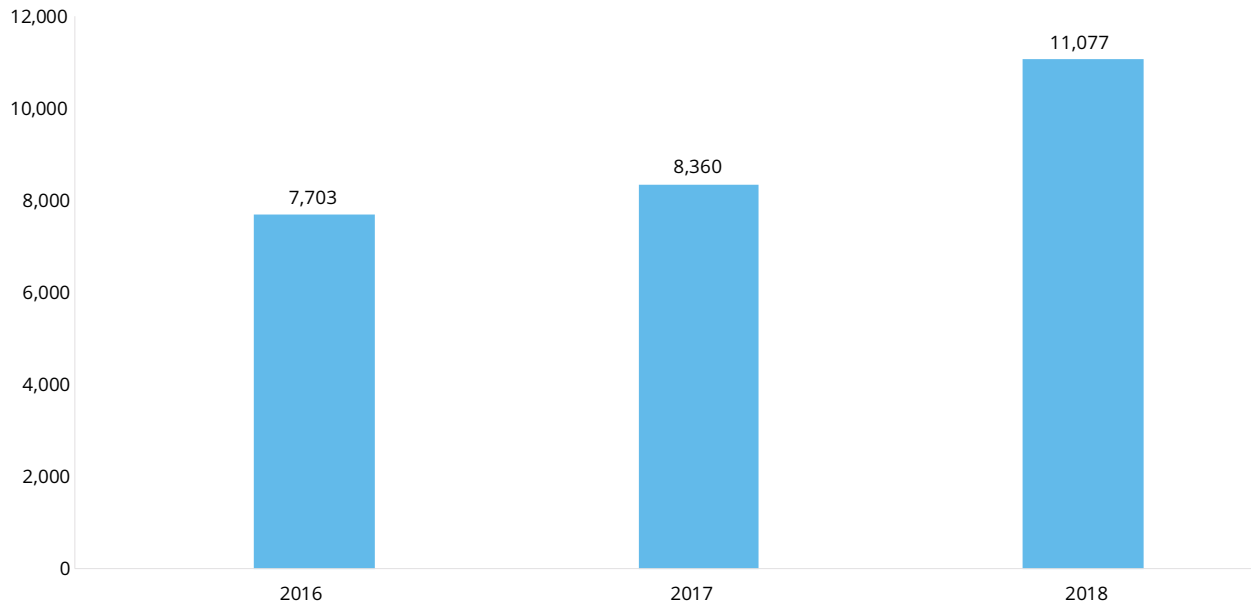
## Number of complaints in the years 2016-2018



Complaints are defined by the Danish DPA as including both individuals' inquiries as well as complaints.

# France

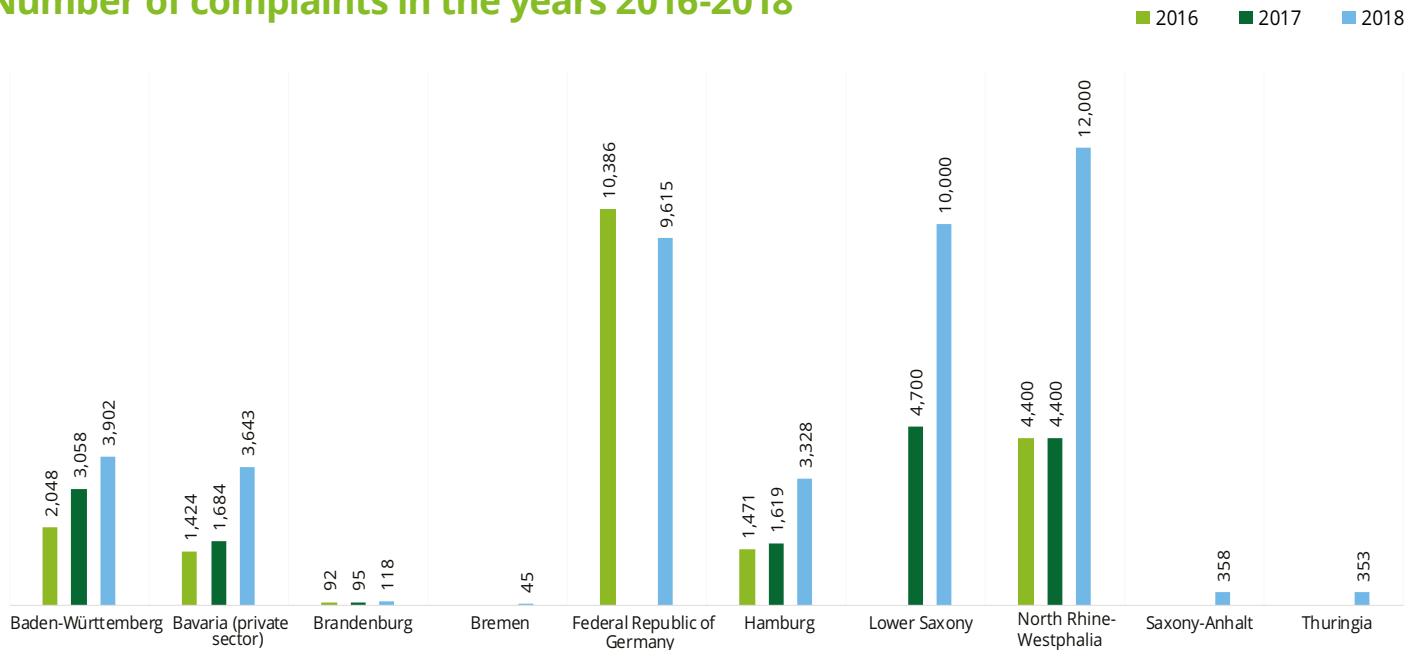
## Number of complaints in the years 2016-2018



The French DPA does not specify what constitutes a "Complaint".

# Germany (including Bundesländer)\*

## Number of complaints in the years 2016-2018



\* No data could be found for Bavaria (public sector), Berlin, Hessen, Mecklenburg-Vorpommern, Rhineland-Palatinate, Saxony, Saarland, and Schleswig-Holstein. Pre-2018 data is missing for Bremen, Saxony-Anhalt, and Thuringia. No separate data on 2017 was reported by the Federal DPA, and Lower Saxony did not report on data for 2016.

# Germany (including Bundesländer) (contd.)

## Number of complaints in the years 2016-2018

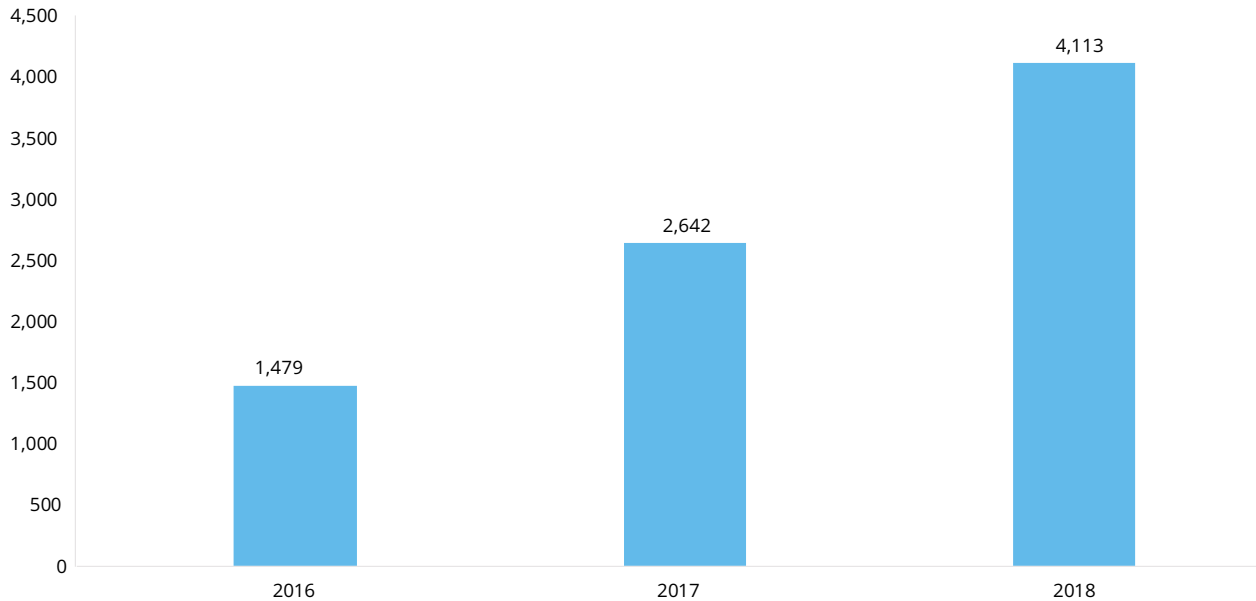
**It is interesting to see** that it is difficult to compare the number of complaints in Germany as well, due to different reporting methods taken by the local DPAs. Some of these differences have been highlighted below:

- Federal Republic of Germany: all individual requests (as opposed to the earlier graph) are counted. For 2018, only requests after entry into force of the GDPR were counted, hence the apparent decrease.
- Hamburg, North Rhine-Westphalia, and Lower Saxony: all correspondence from individuals is counted.
- Bavaria, Saxony-Anhalt, and Thuringia: only individuals' complaints are counted.
- Brandenburg: complaints about video surveillance are counted. No other statistical data exists.
- Bremen: definition is unclear.

Many DPAs in Germany are currently **revising their reporting methods and policies.**

# Ireland

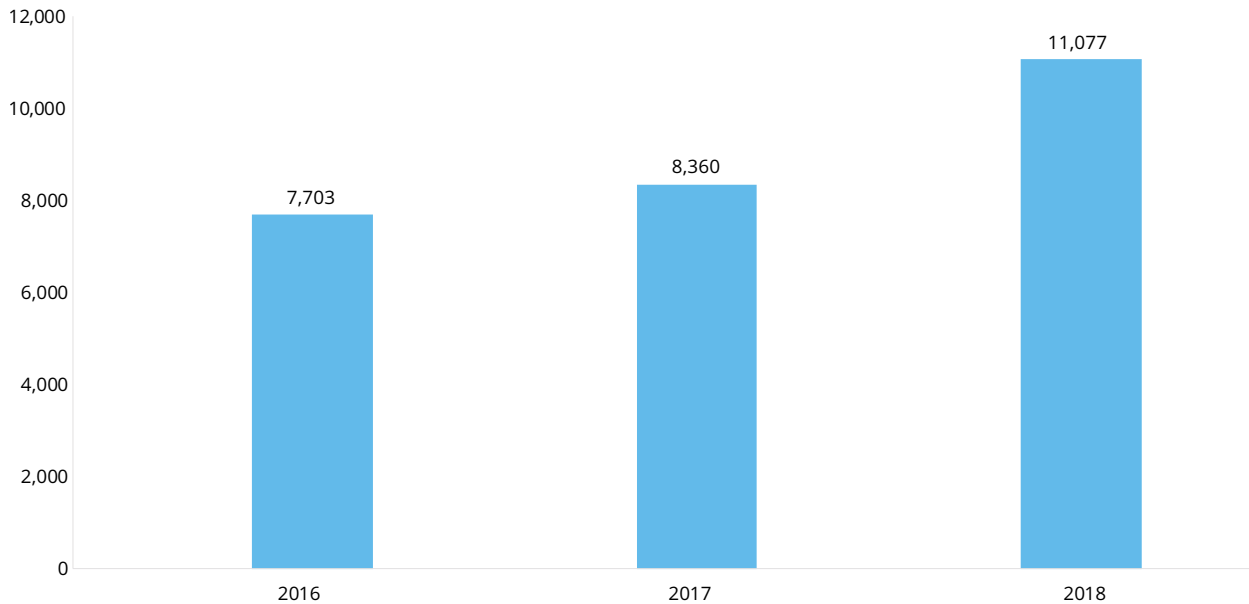
## Number of complaints in the years 2016-2018



The Irish DPA does not specify what constitutes a "Complaint".

# The Netherlands

## Number of complaints in the years 2016-2018

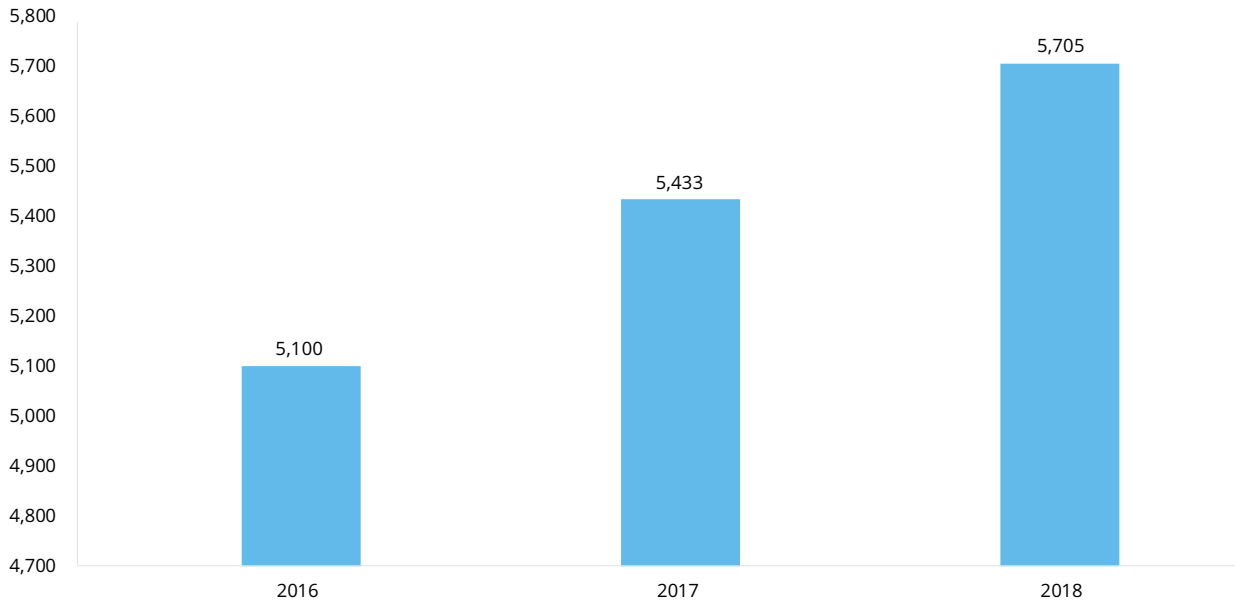


“Complaints” are defined by the Dutch DPA as including individuals’ inquiries, clarifications and complaints.



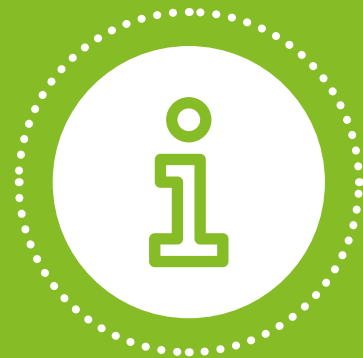
# United Kingdom

## Number of complaints in the years 2016-2018



The British DPA does not specify what constitutes a "Complaint".

# More information?



# More information?

## Contact Deloitte's Privacy Response Services

**Preparation is key.** Knowing the characteristics of your DPA(s) is an important component of preparing for a personal data breach.

At Deloitte's Privacy Response Services, we aim to enable you to prepare for privacy emergencies. We support in understanding the impact and practical implications of personal data breaches before they actually occur, as well as assisting in the response where necessary.

For more information on Deloitte's Privacy Response Services and other privacy-related services, please contact:



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# Appendix Sources



# Complaints Received

## Sources for 2016-2017 data

Country	2016	2017
<b>Austria</b>	Datenschutzbericht 2016	Datenschutzbericht 2017
<b>Bulgaria</b>	Годишен Отчет	Годишен Отчет
<b>Denmark</b>	Datatilsynets Årsrapport 2018	Datatilsynets Årsrapport 2018
<b>France</b>	Rapport d'activité 2016	Rapport d'activité 2017
<b>Ireland</b>	Annual Report of the Data Protection Commissioner of Ireland 2016	Annual Report of the Data Protection Commissioner of Ireland 2017
<b>The Netherlands</b>	Jaarverslag 2016	Jaarverslag 2017
<b>United Kingdom</b>	ICO's Annual Report and Financial Statements 2015/2016	ICO's Annual Report and Financial Statements 2017/2018

# Complaints Received

## Sources for 2018 data

Country	Source
Austria	<a href="https://www.dsb.gv.at/documents/22758/115209/datenschutzbericht_2018.pdf/86c43a23-7778-487a-88c4-a151d4b00a77">https://www.dsb.gv.at/documents/22758/115209/datenschutzbericht_2018.pdf/86c43a23-7778-487a-88c4-a151d4b00a77</a>
Belgium	<a href="https://www.gegevensbeschermingsautoriteit.be/nieuws/zes-maanden-avg-een-balans">https://www.gegevensbeschermingsautoriteit.be/nieuws/zes-maanden-avg-een-balans</a>
Bulgaria	<a href="https://www.cdpd.bg/download.php?part=rubric_element&amp;aid=4350">https://www.cdpd.bg/download.php?part=rubric_element&amp;aid=4350</a>
Cyprus	<a href="http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/All/DF8E7A541F88FDC5C2258392003DC981?OpenDocument">http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/All/DF8E7A541F88FDC5C2258392003DC981?OpenDocument</a>
Czech Republic	<a href="https://www.uouu.cz/assets/File.ashx?id_org=200144&amp;id_dokumenty=33526">https://www.uouu.cz/assets/File.ashx?id_org=200144&amp;id_dokumenty=33526</a>
Denmark	<a href="https://www.datatilsynet.dk/media/6962/aarsrapport_2018.pdf">https://www.datatilsynet.dk/media/6962/aarsrapport_2018.pdf</a>
Estonia	<a href="https://www.aki.ee/et/inspektisioon/statistika">https://www.aki.ee/et/inspektisioon/statistika</a>
France	<a href="https://www.cnil.fr/sites/default/files/atoms/files/cnil-39e_rapport_annuel_2018.pdf">https://www.cnil.fr/sites/default/files/atoms/files/cnil-39e_rapport_annuel_2018.pdf</a>
Germany	<a href="https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfdI/27TB_17_18.pdf?__blob=publicationFile&amp;v=3">https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfdI/27TB_17_18.pdf?__blob=publicationFile&amp;v=3</a>

# Complaints Received

## Sources for 2018 data

Country	Source
Ireland	<a href="https://www.dataprotection.ie/sites/default/files/uploads/2018-11/DPC%20annual%20Report%202018_0.pdf">https://www.dataprotection.ie/sites/default/files/uploads/2018-11/DPC%20annual%20Report%202018_0.pdf</a> <a href="https://www.dataprotection.ie/sites/default/files/uploads/2019-03/DPC%20Annual%20Report%2025%20May%20-%2031%20December%202018.pdf">https://www.dataprotection.ie/sites/default/files/uploads/2019-03/DPC%20Annual%20Report%2025%20May%20-%2031%20December%202018.pdf</a>
Italy	<a href="https://www.gdprtoday.org/gdpr-in-numbers/">https://www.gdprtoday.org/gdpr-in-numbers/</a>
Latvia	<a href="https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publicais_2018_konsolidetais.pdf">https://www.dvi.gov.lv/lv/wp-content/uploads/Gada_parskats_publicais_2018_konsolidetais.pdf</a>
Lithuania	<a href="https://www.ada.lt/go.php/Atvirai-duomenys346">https://www.ada.lt/go.php/Atvirai-duomenys346</a>
Netherlands	<a href="https://autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_bijlage_2018.pdf">https://autoriteitpersoonsgegevens.nl/sites/default/files/atoms/files/ap_bijlage_2018.pdf</a>
United Kingdom	<a href="https://ico.org.uk/media/about-the-ico/documents/2259463/annual-report-201718.pdf">https://ico.org.uk/media/about-the-ico/documents/2259463/annual-report-201718.pdf</a>

# Complaints Received

## Sources for Germany (1/5)

Bundesland	Name of the DPA (in German)	Source
<b>Baden-Württemberg</b>	Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg	<a href="https://www.baden-wuerttemberg.datenschutz.de/wp-content/uploads/2019/02/LfDI-34.-Datenschutz-T%C3%A4tigkeitsbericht-Internet.pdf">https://www.baden-wuerttemberg.datenschutz.de/wp-content/uploads/2019/02/LfDI-34.-Datenschutz-T%C3%A4tigkeitsbericht-Internet.pdf</a>
		<a href="https://www.baden-wuerttemberg.datenschutz.de/wp-content/uploads/2018/02/33.-DS-TB.pdf#">https://www.baden-wuerttemberg.datenschutz.de/wp-content/uploads/2018/02/33.-DS-TB.pdf#</a>
<b>Bavaria (private sector)</b>	Bayrisches Landesamt für Datenschutzaufsicht	<a href="https://www.lida.bayern.de/media/baylda_report_08.pdf">https://www.lida.bayern.de/media/baylda_report_08.pdf</a>
<b>Bavaria (public sector)</b>	Bayrischer Landesbeauftragter für den Datenschutz (BayLfD)	<a href="https://www.datenschutz-bayern.de/">https://www.datenschutz-bayern.de/</a>
<b>Berlin</b>	Berliner Beauftragte für Datenschutz und Informationsfreiheit	<a href="https://www.datenschutz-berlin.de/fileadmin/user_upload/pdf/publikationen/jahresbericht/BlnBDI-Jahresbericht-2018-Web.pdf">https://www.datenschutz-berlin.de/fileadmin/user_upload/pdf/publikationen/jahresbericht/BlnBDI-Jahresbericht-2018-Web.pdf</a>
		<a href="https://www.datenschutz-berlin.de/fileadmin/user_upload/pdf/publikationen/jahresbericht/BlnBDI-Jahresbericht-2017-Web.pdf">https://www.datenschutz-berlin.de/fileadmin/user_upload/pdf/publikationen/jahresbericht/BlnBDI-Jahresbericht-2017-Web.pdf</a>
		<a href="https://www.datenschutz-berlin.de/fileadmin/user_upload/pdf/publikationen/jahresbericht/BlnBDI-Jahresbericht-2016-Web.pdf">https://www.datenschutz-berlin.de/fileadmin/user_upload/pdf/publikationen/jahresbericht/BlnBDI-Jahresbericht-2016-Web.pdf</a>



# Complaints Received

## Sources for Germany (2/5)

Bundesland	Name of the DPA (in German)	Source
<b>Brandenburg</b>	Die Landesbeauftragte für den Datenschutz und für das Recht auf Akteneinsicht Brandenburg	<a href="https://www.lda.brandenburg.de/media_fast/4055/TB_2018_Datenschutz.pdf">https://www.lda.brandenburg.de/media_fast/4055/TB_2018_Datenschutz.pdf</a>
		<a href="https://www.lda.brandenburg.de/media_fast/4055/TB_19.pdf">https://www.lda.brandenburg.de/media_fast/4055/TB_19.pdf</a>
<b>Bremen</b>	Die Landesbeauftragte für den Datenschutz der Freien Hansestadt Bremen	<a href="https://www.datenschutz.bremen.de/sixcms/media.php/13/1.%20Jahresbericht%20Datenschutz.pdf">https://www.datenschutz.bremen.de/sixcms/media.php/13/1.%20Jahresbericht%20Datenschutz.pdf</a>
		<a href="https://www.datenschutz.bremen.de/sixcms/media.php/13/40.%20JB%20Datenschutz.pdf">https://www.datenschutz.bremen.de/sixcms/media.php/13/40.%20JB%20Datenschutz.pdf</a>
		<a href="https://www.datenschutz.bremen.de/sixcms/media.php/13/39.%20Jahresbericht%20Datenschutz.pdf">https://www.datenschutz.bremen.de/sixcms/media.php/13/39.%20Jahresbericht%20Datenschutz.pdf</a>
<b>Federal Republic of Germany</b>	Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit	<a href="https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfDI/27TB_17_18.pdf?__blob=publicationFile&amp;v=4">https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfDI/27TB_17_18.pdf?__blob=publicationFile&amp;v=4</a>
		<a href="https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfDI/26TB_15_16.html?nn=5217212">https://www.bfdi.bund.de/SharedDocs/Publikationen/Taetigkeitsberichte/TB_BfDI/26TB_15_16.html?nn=5217212</a>
<b>Hamburg</b>	Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit	<a href="https://datenschutz-hamburg.de/taetigkeitsberichte/TB-D-2018/">https://datenschutz-hamburg.de/taetigkeitsberichte/TB-D-2018/</a>
		<a href="https://datenschutz-hamburg.de/taetigkeitsberichte/TB-I-2016-2017/">https://datenschutz-hamburg.de/taetigkeitsberichte/TB-I-2016-2017/</a>

# Complaints Received

## Sources for Germany (3/5)

Bundesland	Name of the DPA (in German)	Source
Hessen	Der Hessische Beauftragte für Datenschutz und Informationsfreiheit	<a href="https://datenschutz.hessen.de/sites/datenschutz.hessen.de/files/2017_46_TB_0.pdf">https://datenschutz.hessen.de/sites/datenschutz.hessen.de/files/2017_46_TB_0.pdf</a>
Lower Saxony	Die Landesbeauftragte für den Datenschutz Niedersachsen	<a href="https://lfd.niedersachsen.de/download/144513/24_Taetigkeitsbericht_2017_-_2018.pdf">https://lfd.niedersachsen.de/download/144513/24_Taetigkeitsbericht_2017_-_2018.pdf</a> <a href="https://lfd.niedersachsen.de/download/135760/23_Taetigkeitsbericht_der_Landesbeauftragten_fuer_den_Datenschutz_Niedersachsen_fuer_die_Jahre_2015-2016.pdf">https://lfd.niedersachsen.de/download/135760/23_Taetigkeitsbericht_der_Landesbeauftragten_fuer_den_Datenschutz_Niedersachsen_fuer_die_Jahre_2015-2016.pdf</a>
Mecklenburg-Vorpommern	Der Landesbeauftragte für Datenschutz und Informationsfreiheit Mecklenburg-Vorpommern	<a href="https://www.datenschutz-mv.de/static/DS/Dateien/Publikationen/Taetigkeitsberichte/lfdmvtb14.pdf">https://www.datenschutz-mv.de/static/DS/Dateien/Publikationen/Taetigkeitsberichte/lfdmvtb14.pdf</a> <a href="https://www.datenschutz-mv.de/static/DS/Dateien/Publikationen/Taetigkeitsberichte/lfdmvtb12.pdf">https://www.datenschutz-mv.de/static/DS/Dateien/Publikationen/Taetigkeitsberichte/lfdmvtb12.pdf</a>
North Rhine-Westphalia	Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen	<a href="https://www.lidi.nrw.de/mainmenu_Aktuelles/Inhalt/DIB-2019/24_-DIB-2019.pdf">https://www.lidi.nrw.de/mainmenu_Aktuelles/Inhalt/DIB-2019/24_-DIB-2019.pdf</a>
Rhineland-Palatinate	Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Rheinland-Pfalz	<a href="https://www.datenschutz.rlp.de/de/service/infothek/taetigkeitsberichte/">https://www.datenschutz.rlp.de/de/service/infothek/taetigkeitsberichte/</a>

# Complaints Received

## Sources for Germany (4/5)

Bundesland	Name of the DPA (in German)	Source
Saarland	Unabhängiges Datenschutz Zentrum Saarland	<a href="https://datenschutz.saarland.de/fileadmin/tberichte/tb27_1718.pdf">https://datenschutz.saarland.de/fileadmin/tberichte/tb27_1718.pdf</a>
		<a href="https://datenschutz.saarland.de/fileadmin/tberichte/tb26.pdf">https://datenschutz.saarland.de/fileadmin/tberichte/tb26.pdf</a>
Saxony	Sächsischer Datenschutzbeauftragter	<a href="https://www.saechdsdb.de/images/stories/sdb_inhalt/oeb/taetigkeitsberichte/18-Ttigkeitsbericht-Version-5-Endfassung.pdf">https://www.saechdsdb.de/images/stories/sdb_inhalt/oeb/taetigkeitsberichte/18-Ttigkeitsbericht-Version-5-Endfassung.pdf</a>
Saxony-Anhalt	Landesbeauftragter für den Datenschutz Sachsen-Anhalt	<a href="https://datenschutz.sachsen-anhalt.de/informationen/veroeffentlichungen/taetigkeitsberichte/tb-15/">https://datenschutz.sachsen-anhalt.de/informationen/veroeffentlichungen/taetigkeitsberichte/tb-15/</a>
		<a href="https://datenschutz.sachsen-anhalt.de/fileadmin/Bibliothek/Landesaemter/LfD/PDF/binary/Informationen/Veroeffentlichungen/Taetigkeitsberichte/TB_13-14/LfD-ST_13.-14_TB.pdf">https://datenschutz.sachsen-anhalt.de/fileadmin/Bibliothek/Landesaemter/LfD/PDF/binary/Informationen/Veroeffentlichungen/Taetigkeitsberichte/TB_13-14/LfD-ST_13.-14_TB.pdf</a>
Schleswig-Holstein	Unabhängiges Landeszentrum für Datenschutz Schleswig-Holstein	<a href="https://www.datenschutzzentrum.de/tb/tb37/uld-37-taetigkeitsbericht-2019.pdf">https://www.datenschutzzentrum.de/tb/tb37/uld-37-taetigkeitsbericht-2019.pdf</a>
		<a href="https://www.datenschutzzentrum.de/tb/tb36/uld-36-taetigkeitsbericht-2017.pdf">https://www.datenschutzzentrum.de/tb/tb36/uld-36-taetigkeitsbericht-2017.pdf</a>

# Complaints Received

## Sources for Germany (5/5)

Bundesland	Name of the DPA (in German)	Source
Thuringia	Thüringer Landesbeauftragter für den Datenschutz und die Informationsfreiheit	<a href="https://www.tlfdi.de/tlfdi/datenschutz/taetigkeitsberichte-zum-datenschutz/tb1dsgvo2018">https://www.tlfdi.de/tlfdi/datenschutz/taetigkeitsberichte-zum-datenschutz/tb1dsgvo2018</a>
		<a href="https://www.tlfdi.de/tlfdi/datenschutz/taetigkeitsberichte-zum-datenschutz/tb3noe2016">https://www.tlfdi.de/tlfdi/datenschutz/taetigkeitsberichte-zum-datenschutz/tb3noe2016</a>
		<a href="https://www.tlfdi.de/tlfdi/datenschutz/taetigkeitsberichte-zum-datenschutz/tb12oe2016">https://www.tlfdi.de/tlfdi/datenschutz/taetigkeitsberichte-zum-datenschutz/tb12oe2016</a>



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