

Hotel Online AS  
c/o Oslo  
International Hub  
Oscars gate 27  
0352 OSLO

***Exempt from public  
disclosure:  
Offl. § 20 første ledd B***

IMI Case Rep. reference  
293985

Our reference  
20/02292-8

Date  
03.05.2021

## **Closure of case**

We refer to our latest request for information dated 4 January 2021 and your letter dated 23 January 2021.

A complaint has been lodged with the Norwegian SA against you, Hotel Online AS (formerly Global Travel Technology AS/European Travel Group AS). We are the leading supervisory authority as Cityhotels.no/com is a hotel portal owned by you as a Norwegian registered company with your main establishment in Norway.

The subject matter of the complaint is an alleged breach of security of processing. The complainant booked a hotel through cityhotels.no. Upon completion of the transaction, an order confirmation was given in the form of a web-page. The complainant discovered that basic manipulation of the URL of the web-page revealed order confirmations of other customers. Order confirmations include information such as the name and home address of the data subject, the hotel booked, dates of stay and price.

You acknowledge the lack of security of processing when processing personal data through your booking website [www.cityhotels.no](http://www.cityhotels.no). After we made you aware of the security issue connected to the booking website, you have closed down [www.cityhotels.no](http://www.cityhotels.no). You are also in the process of establishing a new booking system on [cityhotels.com](http://cityhotels.com), with a brand new solution that you have stated will satisfy the requirements of the GDPR.

We refer to your full response to our order to provide information regarding all measures you have taken.

Generally, this type of lack of security of processing could have adverse personal data consequences. However, in the view of the Norwegian SA, you has taken adequate and appropriate measures to address the issue by closing down the website and getting data protection expertise when setting up a new booking website. In addition, we have no information that personal data of costumers has been abused by manipulating the URL.

**Taking into account the above, the Norwegian SA not see a need to pursue this matter further. We therefore close the case.**

Kind regards

Tobias Judin  
Head of Section

Tanja Czelusniak  
Legal advisor

*This letter has electronic approval and is therefore not signed*

Copy: Complainant