

From: [REDACTED]
Sent: Wednesday, February 15, 2017 10:01 AM
To: JUST ARTICLE29WP SEC; presidenceg29@cnil.fr
Subject: Consultation on the Guidelines on the right to data portability

Sirs,

We appreciate the opportunity given to the public to offer opinion on the Guidance issued by the Working Party.

In reviewing the draft Guidelines on the right to data portability, we found very useful the provision of examples which help data controllers determining in which circumstances they have to implement this new right.

We note that most examples are related to internet services and to consumer purchasing behavior. Questions arise then as to the applicability of this right to other sectors.

As the Working Party is working on an updated version of the Guidelines, it would be useful to consider whether the right to portability is applicable to other sectors, including to records collected in the framework of payroll delivery, recruitment activities and other Human Resources activities.

We are at your disposal, should you wish to discuss the matter.

Very Truly Yours

[REDACTED]
Regional Privacy Officer – EMEA



Nanterre - France

