

**From:** [REDACTED]  
**Sent:** 16 December 2016 07:19  
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**Subject:** Data portability & right to be forgotten

Very interesting to read the WP29 opinion on data portability. No real surprises to me. Yet I'm missing something: guidance on data portability and the right to be forgotten (ie Article 17 and recitals 65 & 66). Not so much in relation to a download ("receive") but in case of a direct transfer to another controller. Should he be made aware? Or does this not have to be considered as the data have not been made "public" as per recital 66? Some guidance on this would have been nice :)

The recommendation related to APIs can of course be easily extended for this.

(Btw: here is an example of an operational API serving data portability/transfer:  
<https://developer.tomtom.com/mysports-cloud>)