

Ms. Helen Dixon
Commissioner
Irish Data Protection Commission
By email only

The Consumer Voice in Europe

Ref.: BEUC-X-2019-074/UPA/DMA/cs

Brussels, 26 November 2019

Re: Coordinated complaints of November 2018 from consumer organisations against Google's deceptive location tracking

Dear Ms. Dixon,

I address you on behalf of BEUC, The European Consumer Organisation, and the group of national consumer organisations that, one year ago¹, filed a series of complaints in different EU countries against Google for breaching the General Data Protection Regulation (GDPR) in relation to how the company tracks its users' location. BEUC coordinated this action and brought it to the attention of the EDPB.

In August 2019, some of the organisations involved were informed by their DPAs that your Authority had officially taken over the case. Recently, two organisations (Forbrukerrådet from Norway and Zveza Potrošnikov Slovenije from Slovenia) have received requests from your services to provide additional information.

One year after these complaints were filed, it has yet not been decided whether Google infringed the GDPR. The company has not been told to stop its practices, which in our opinion breach the law and harm consumers. We are aware that carrying out thorough investigations and adopting well-grounded decisions takes time. However, standing up against those who disrespect consumers' privacy in the fast-moving digital world should not be something which takes years. Otherwise, consumers will lose trust in the public authorities' ability to protect their rights.

On behalf of our member organisations, we kindly ask if you could inform us about the state of play of the complaints and the next steps in the proceedings. We would also like to kindly request a meeting to discuss this and how we could help advance the procedure.

We look forward to hearing from you and hope that it will be possible to find the time to meet in your undoubtedly very busy schedule.

We remain at your disposal for any further information you may require at this stage.

Yours sincerely,

Ursula Pacht
Deputy Director General

¹ [Consumer groups across Europe file complaints against Google for breach of GDPR](#) (BEUC Press release, 27 November 2019)