

Eurodac SCG

Report on the exercise of data subjects' rights in relation to Eurodac



November 2019

1. Introduction & Background

The rights of data subjects are key to data protection as they allow individuals some control over the processing of their personal data. Ensuring that data subjects can effectively access and ask for the correction or deletion of data held about them increases the transparency of data processing for them, helps to uncover unlawful data processing and increases data quality for lawful data processing by the controllers. These considerations are all the more relevant in the field of asylum applications given the adverse consequences that unlawful or erroneous data processing might have on asylum applicants.

The Eurodac SCG has investigated the exercise of data subjects' rights in the past; it notably adopted a Report on the national preparation for the implementation of the Eurodac Recast¹, which included several questions related to data subjects' rights. Given the importance of this topic, the Eurodac SCG decided at its meeting of 14 June 2017 to further investigate how requests to exercise data subjects' rights are dealt with in practice.

2. Legal background

Eurodac was created by Council Regulation (EC) No 2725/2000 of 11 December 2000², as completed by Council Regulation (EC) No 407/2002 of 28 February 2002³. Those two texts were repealed and recast in one regulation for the sake of clarity: Regulation (EU) No

¹https://edps.europa.eu/sites/edp/files/publication/16-04-00_report_implementation_Eurodac_recast_en.pdf

² Council Regulation (EC) No 2725/2000 of 11 December 2000 concerning the establishment of "Eurodac" for the comparison of fingerprints for the effective application of the Dublin Convention, hereinafter "Eurodac Regulation", OJ L 316, 15.12.2000, pp. 1 - 10.

³ Council Regulation (EC) No 407/2002 of 28 February 2002 laying down certain rules to implement Regulation (EC) No 2725/2000 concerning the establishment of "Eurodac" for the comparison of fingerprints for the effective application of the Dublin Convention, OJ L 62, 05.03.2002, pp. 1 - 5.

603/2013 of 26 June 2013⁴ (hereinafter 'the Eurodac Regulation') that entered into force on 20 July 2015.

The Eurodac Regulation provides new provisions with data protection implications, among which the most significant is the possibility for national law enforcement authorities and Europol to request access to data stored in the Eurodac system (Articles 19 to 21).

Article 29 of the Eurodac Regulation defines the rules as regards the exercise of data subjects' rights. Article 29 counts 15 paragraphs in total.

- Paragraphs 1 to 3 provide for the obligation for Member States to **inform** data subjects in writing, and where necessary orally, of the identity of the controller, the purpose(s) for which their personal data will be processed, the recipients of the data, the obligation to be fingerprinted, the existence of the rights of access, deletion and erasure of personal data, the procedures for exercising such rights and the contact details of the controller and the data protection authority ('DPA') in charge of the supervision. Such information can be provided at different times depending on the purpose of the processing. For minors, this information must be provided in an age-appropriate manner. Lastly, a leaflet with all this information must be drawn up.
- Paragraph 4 provides for the right of data subjects to **access** their data.
- Paragraphs 5 to 8 provide for the rights of data subjects to obtain the **correction** of data concerning them that are factually inaccurate and **deletion** of their data when they have been unlawfully recorded. In case where requests for correction or deletion are rejected, the Member States that transmitted the data to the Central system must explain to data subjects in writing the reasons for their decision. In addition, they must inform data subjects of steps that they could take if they do not accept the explanation provided.
- Paragraph 9 says that, when data subjects make requests to exercise their data protection rights, they must provide all necessary information to identify themselves, including their fingerprints.
- Paragraph 10 provides for the **active cooperation of national competent authorities** to enforce the rights to correction and deletion.
- Paragraph 11 provides that the competent authorities have the obligation to keep **records of all access requests** made by data subjects and of how these requests were addressed. Such records must be available for DPAs.

⁴ Regulation (EU) No 603/2013 of the European Parliament and of the Council of 26 June 2013 on the establishment of 'Eurodac' for the comparison of fingerprints for the effective application of Regulation (EU) No 604/2013 establishing the criteria and mechanisms for determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person and on requests for the comparison with Eurodac data by Member States' law enforcement authorities and Europol for law enforcement purposes, and amending Regulation (EU) No 1077/2011 establishing a European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice, OJ L 180, 29.06.2013, pp. 1 - 30.

- Paragraphs 12 to 13 provide that DPAs have to give **assistance** to data subjects when exercising their data protection rights in accordance with Article 28(4) of Directive 95/46/EC⁵.
- Paragraph 14 says that, in case of rejection of their access request, data subjects can complain to the DPA or bring action in front of national courts in accordance with national law.
- Paragraph 15 says that, in case of rejection of their correction or deletion request, data subjects can complain to the DPA or bring action in front of national courts in accordance with national law.

In comparison to the previous legal framework, the Eurodac Regulation has brought some changes regarding the exercise of data subjects' rights, in particular:

- data subjects must be informed in writing and also where necessary orally (Article 29(1));
- data subjects must be informed of the fact that their data may be accessed for law enforcement purposes by national competent authorities and/or Europol (Article 29(1)(b));
- when data subjects are minors, information shall be provided to them in an age-appropriate manner (Article 29(2));
- there is an obligation to draw up a common leaflet to inform data subjects of their rights, which must be clear and simple and drafted in a language that data subjects understand or are reasonably supposed to understand (Article 29(3));
- whenever a person requests data relating to him or her, the competent authority shall keep a record in the form of a written document that such a request was made and how it was addressed, and shall make that document available to the national supervisory authorities without delay (Article 29(11)).

3. Content of the questionnaires & Methodology

To further investigate how requests to exercise data subjects' rights are dealt with in practice, the Eurodac SCG drafted a questionnaire, which was adopted in December 2017 and sent to all Member States⁶. The full questionnaire is reproduced in Annex I.

This questionnaire pursued two objectives: (a) receive an overview of the procedures in place for dealing with data subject's rights and (b) identify best practices and possible improvements. To this end, the questionnaire was divided into seven sections relating to (1) the right to information, (2) the right of access, (3) requests to exercise data subjects' rights,

⁵ Since 25 May 2018, Directive 95/46/EC is repealed and replaced by the General Data Protection Regulation (GDPR). See Article 57 of the GDPR concerning the tasks of DPAs in relation to the exercise of data subjects' rights and complaints.

⁶ When referred to 'Member States' in this report, it must be understood as all countries having access to Eurodac.

(4) procedures for granting the right to correction, (5) procedures for granting the right to deletion, (6) cooperation of competent authorities to ensure data protection rights and (7) redress mechanisms.

The choice of how to gather the information needed to answer this questionnaire was left to the Members of the Eurodac SCG; both desk work and on-the-spot inspections are viable options.

4. Analysis of answers

Answers were collected throughout 2018. This report is based on 27 answers.

4.1. Right of information

Q1. Could you explain how the obligation for Member States to inform data subjects in writing, and where necessary orally, of the collection of data about them (Article 29(1)), is applied in practice? Please explain the procedures for providing such information (timing, type of information) and provide privacy statement or other information material made available to data subjects.

Member States reported that they usually inform data subjects either by providing the necessary information orally, or in written form, or both. In addition, some Member States use the help of interpreters to provide this information if specific circumstances require it (for instance, data subjects are blind or cannot read), or to provide the information orally if the written information is not available in a language that data subjects understand.

The moment where this information is provided differs from one Member State to another. Some Member States provide it at the time of filing the application for asylum and others inform just before fingerprints are taken. In one instance, some information is made available on the homepage of the system used for the editing of the results and is available to every person whose fingerprints are taken. In addition, three Member States reported that the information was provided multiple times during the application process. One Member State clarified that the moment of provision of the information depends on the category to which the data subject belongs.

Leaflets (or booklets) are used by most Member States to communicate the necessary information to data subjects. In addition to the national languages of the Member States, those leaflets are also available in several foreign languages (e.g. up to 50 language versions in one State). At least one Member State referred both to a specific booklet and to the data protection notice given to applicants pursuant to Regulation 2016/679.

One Member State informed that asylum seekers are also shown a film on the further course of their case, which includes information on the processing of their data and their data protection rights.

Q2. *Are the procedures for providing information to data subjects documented? If yes, please explain.*

The majority of Member States confirmed that procedures exist to document the provision of information to data subjects. The form of this documentation varies in practice. Some Member States clarified that the procedures are available on the intranet or in internal guidelines. A minority of Member States reported that such procedure does not exist yet.

To demonstrate that information was provided, most Member States request data subjects to sign a written document, either the leaflets used to communicate the information or a separate document. Some Member States also require staff members present at the time of the provision of this information and/or interpreters who provided the information orally to also sign the written document used as documentation. Other Member States do not request data subjects' signature but ensure that the provision of information is indicated by staff members in their file.

Several Member States specified that this written document is kept in data subjects' application files.

Q3. *Is there any kind of check that data subjects have actually understood the information provided to them? If yes, please explain what such a check consists of.*

The majority of Member States check whether or not data subjects have actually understood the information provided to them.

A considerable number of Member States perform this check - with or without the help of interpreters - by asking data subjects for oral confirmation that they understood the information. In this case, Member States further indicated that they may ask for such oral confirmation repeatedly or they may ask data subjects to repeat the information that they have received. In order to document such check, a Member State reported that, when asked if they understood the information provided to them, data subjects' responses are recorded in their file. Other Member States reported that this confirmation takes place in writing (for instance, through the signature of a document). A minority of Member States seem to assume that the information is understood when it is provided in a language that data subjects understand or when they have the possibility to ask questions and do not perform any specific check.

In addition, several Member States informed that data subjects may also ask questions orally at different stages throughout the application process.

Q4. *Data subjects must be informed of the fact that their data could now also be accessed for law enforcement purposes by national competent authorities and/or Europol (Article 29(1)(b)). Please describe if and how data subjects are informed of the use of their data for law enforcement purposes.*

The majority of Member States inform data subjects of the fact that their data could also be accessed for law enforcement purposes in writing. The information is conveyed as part of

the written documents referred to under **Q1**. Two of those Member State further inform data subjects of this possibility of law enforcement access orally. Among the Member States who reported that a review or assessment of the current leaflets is ongoing, one reported that data subjects will be informed in writing once their leaflet is updated; until then the information is provided orally. One respondent only specified that these obligations are dealt with by the entities collecting fingerprint data.

Several Member States do not yet have access to Eurodac, or have limited access for law enforcement purposes, and thus do not provide this information to data subjects whose data they enter in the database.

***Q5.** In the case of minors, which specific measures have been taken to ensure that the information is provided in an age-appropriate manner in accordance with Article 29(2)?*

The great majority of Member States have specific measures in place to handle minors' application files and provide them the information referred to in Article 29(1) in an age-appropriate manner.

- 1) Member States informed that minors are accompanied by an adult in all steps of the application process. As regards unaccompanied minors, a representative or legal guardian or social worker is appointed to take care of them during this process. Member States further reported that the information is conveyed to these adults and that these persons convey the information to children in an age-appropriate manner. Sometimes the assistance of an interpreter is employed.
- 2) Several Member States have specific leaflets or brochures available to convey information to minors in an age-appropriate manner (for instance using symbols). One Member State uses an audio-visual guide to provide information to minors.
- 3) Several Member States have staff members with specific training to deal with minors, who provide the information (possibly with the help of an interpreter).

One respondent only specified that these obligations are dealt with by the entities collecting fingerprint data.

***Q6.** Do you use the different model leaflets in annexes X to XIII of the Commission Implementing Regulation (EU) No 118/2014 to inform data subjects of their rights (Article 29(3))? If yes, in which languages these leaflets are offered to data subjects?*

The majority of Member States use these different model leaflets to inform data subjects of their rights. A minority of Member States does not use them (yet). The leaflets are offered to data subjects in the language versions provided by the Commission. If leaflets are not available in languages that data subjects can understand (i.e. their mother tongue or an international language), several Member States reported that they will use the help of interpreters to orally translate the information in the leaflet to data subjects. One respondent mentioned that the category 1 leaflet is available in 55 languages whereas another one declared that the leaflets in annexes X and XI of the Implementing Regulation are being translated in 42 languages.

Several Member States reported that they have their own information material, which might also be translated in a number of foreign language versions (i.e. up to 48).

One respondent only specified that these obligations are dealt with by the entities collecting fingerprint data.

Q7. Do you think that the model leaflets are simple and have been drafted in a language that data subjects understand or are reasonably supposed to understand? If not, what could be improved in your opinion?

The majority of Member States considers that these model leaflets are simple and easy to understand. Some Member States consider that they could be further improved, for instance by shortening the information or including pictures and/or symbols. In addition, one Member State considers that the number of language versions available is not sufficient. One respondent answered that it has no experience with the application of the leaflets in annexes X and XI.

Q8. How are the model leaflets (or other leaflets) on data subjects' rights made available to data subjects in practice? Could you please specify at what stage, where and, if this information is available, how many leaflets have been given away since July 2016?

The majority of Member States reported that leaflets are handed over by national competent authorities - and read aloud by an interpreter if necessary - to asylum applicants during the application process to provide them the information referred to in Article 29(1). However, one Member State specified that this also depends on the relevant variant of the model leaflet(s). One Member State informed that for the time being leaflets are shown (but not given away) to data subjects who are given some time to read them, whereas another respondent clarified that no leaflet has been handed out but the information is available on the website. One Member State mentioned that the leaflets are also available on the intranet at any time.

The moment where this information is provided differs from one Member State to another (see **Q1**).

As regards the number of model or national leaflets given away, the majority of Member States were not able to provide statistics.

Other Member States provided numbers of leaflets provided to data subjects since July 2016 on the basis of the number of asylum applications filed or the number of persons fingerprinted since that date. For instance, a Member State gave away 6593 leaflets between July 2016 and February 2018, which corresponds to the number of applications filed during that period. Another gave away 3565 leaflets, which corresponds to the number of persons fingerprinted. A third one distributed around 2400 leaflets between July 2016 and March 2018.

Other Member States informed that they distributed between 600 to more than 30,000 leaflets since July 2016.

Q9. *Does a specific website exist to inform data subjects about their rights?*

The majority of Member States reported that they do not have such specific website to inform data subjects about their rights.

However, several Member States have a specific website or a specific section of their website dedicated to data subjects' rights.

Nevertheless, Member States have information on their websites about their procedures and the information is given when the data subject is specifically concerned.

4.2. Right of access

Q10. *Please describe the procedures in place for granting the right to access (e.g. formal requirements, time limits for replying, fees, possible exemptions) in accordance with Article 29(4).*

As regards formal requirements, several Member States indicated that the procedure for granting the right of access must be launched through a written request addressed to the national competent authorities. In order to confirm the identity of the data subject, Member States reported that a copy of an identification document should be attached to the request or applicants should have their fingerprints taken and checked against the Eurodac system.

As regards time limits to reply, it is 30 days maximum in most Member States but it is shorter in some Member States (for instance 8 days or 15 days). Several Member States reported that this time limit may be extended when necessary, taking into account the complexity of the request and the total number of requests.

As regards possible fees, the majority of Member States do not charge any fee for paper copies. Additionally, two Member States apply an administrative fee for the copy of the file.

Q11. *When individuals request data relating to them, the competent authority shall keep records in the form of written documents that such requests were made and how they were addressed, and shall make these documents available to the national supervisory authorities without delay (Article 29(11)). How has this measure been implemented in practice?*

Member States have implemented the measure of keeping records of the requests in the form of written documents in different ways. A majority of Member States reported that national competent authorities keep records of requests in their systems. One Member State informed that records of requests are kept by the DPO of the national competent authorities. Another Member State reported that records of requests are kept in the personal files of data subjects.

As regard the communication to national DPAs, several Member States reported that their national competent authorities keep records of the requests, which are provided to the DPA

upon request. Other Member States reported that these records were sent to the DPA (without referring to any prior request from the DPA).

Q12. *How many requests for access have been recorded in accordance with Article 29(11) of the Eurodac Regulation since July 2016?*

The great majority of Member States informed that they have not recorded any request for access since July 2016. One Member State informed that they have records of 6 requests end 2016, 55 requests in 2017 and 20 requests early 2018. Several Member States informed that they have records of two requests and one has reported less than 5.

Q13. *Are any other kind of requests - i.e. requests for information, deletion or erasure - recorded as well? If yes, please specify how many of such requests have been recorded.*

The great majority of Member States informed that they have not received other kind of requests yet. Only two Member States have received one request from a data subject to correct his/her personal data.

4.3. Requests to exercise data subjects' rights

Q14. *All requests made by data subjects to exercise their rights to access, correction or deletion shall contain all the necessary particulars to identify them, including fingerprints (Article 29(9)). Which data do data subjects have to provide with requests to exercise their data protection rights?*

Member States mainly ask for the fingerprints of data subjects who exercise their rights and rely on this information to check their identity. In addition, they may ask for further official documents, such as identification documents (e.g. passport, identity card, driving license, etc) or documents from the asylum authority, which contain the names, surnames, date of birth and nationality of the data subject.

Q15. *How is the obligation to provide fingerprints applied in practice? Do data subjects have to appear in person to have their fingerprints taken in order to confirm their identity?*

The majority of Member States confirmed that data subjects who exercise their rights are invited to appear in person to have their fingerprints taken. One Member State specified that police authorities are in charge of taking fingerprints on behalf of asylum authorities. Five Member States informed that the obligation to provide fingerprints is not applied for the time being.

Q16. *How long does the controller keep the personal data of data subjects that are necessary to identify themselves?*

Regarding the retention period of personal data necessary to identify data subjects who exercise their rights, four Member States reported that such data are not stored beyond the category 9 search. Two Member States reported that such data are stored until the identity of the data subject is confirmed. Two Member States reported that such data are stored until the corresponding procedure to exercise data protection rights ends. Two Member States informed that there is currently no fixed retention period.

Finally, four Member States referred to specific retention period of 18 months, 5 years or 10 years.

Q17. Does the competent authority accept requests in another language than of the State in which the request is done? If yes, which languages does the competent authority accept and in which language is the answer to such request given?

The majority of Member States informed that their competent authorities accept requests in their national language(s) and in English. For other foreign languages, their competent authorities will use the help of a translator or an interpreter to provide their answers to data subjects. One Member State informed that the competent authorities only accept requests in its national language.

Several Member States informed that the competent authorities would answer such requests only in their national language(s). Several Member States informed that the competent authorities would answer such requests only in their national language(s) or in English.

4.4. Procedures for granting the right to correction

Q18. The correction of data that are factually inaccurate shall be carried out without excessive delay by the Member State which transmitted the data, in accordance with its laws, regulations and procedures. Please describe the procedure in place for granting the right to correction in accordance with Article 29(5) and (6).

The great majority of Member States confirmed that their national competent authorities would grant the right to correction in cases of factually inaccurate data in Eurodac. Most of them did not refer to any specific procedure in place, while two explicitly stated that there is currently no formal procedure in place for granting the right to correction. A number of Member States specified that their authorities have never received request for correction in relation to Eurodac data or received a very low number of such requests.

Several Member States reported that the right to correction should be exercised through a written request. Several Member States also informed that the competent authorities would carry out a case-by-case assessment of such requests. One Member State specified that this would be done by the DPO of their competent authority. Another specified that the answer to the request would also be addressed to the data subject in writing. If the request for correction is deemed legitimate, Member States reported that their competent authorities would proceed to the correction in accordance with Article 27 of the Eurodac Regulation. Two Member States specified that data subjects would be informed of the correction of their data in Eurodac.

4.5. Procedures for granting the right to deletion

Q19. The erasure of data that are recorded unlawfully shall be carried out without excessive delay by the Member State which transmitted the data, in accordance with its laws, regulations and procedures. Please describe the procedure in place for granting the right to deletion in accordance with Article 29(5) and (6).

The great majority of Member States confirmed that their national competent authorities would grant the right to deletion in cases of unlawfully recorded data in Eurodac. Most of them did not refer to any specific procedure in place, while two explicitly stated that there is currently no formal procedure in place for granting the right to deletion. A number of Member States specified that their authorities have never received request for deletion in relation to Eurodac data or received a very low number of such requests.

Several Member States reported that the right to deletion should be exercised through a written request. Several Member States also informed that the competent authorities would carry out a case-by-case assessment of such requests. One Member State specified that this would be done by the DPO of their competent authority. Another specified that the answer to the request would also be addressed to the data subject in writing. If the request for deletion is deemed legitimate, Member States reported that their competent authorities would proceed to the deletion in accordance with Article 27 of the Eurodac Regulation. Two Member States specified that data subjects would be informed of the deletion of their data in Eurodac.

4.6. Cooperation to ensure the rights on data protection

***Q20.** How do the competent authorities cooperate actively to enforce the rights to correction and deletion (Article 29(10))?*

The majority of Member States informed that such cooperation has never occurred so far but that an active cooperation between competent authorities would take place where necessary.

4.7. Redress mechanisms

***Q21.** In case the request for access is refused, data subjects may bring an action before the national courts or a complaint to the DPA for a review of the decision of refusal (Article 29(14)). Whom can data subjects address for a review of such decision of refusal according to national law? Please also precise how many complaints have been addressed to the DPA and/or how many cases have been brought to the courts in this regard since July 2016?*

The great majority of Member States informed that, in cases where a decision of refusal is taken in relation to requests for access, data subjects can appeal this decision and ask for a review of their request by the competent national authority under national law, i.e. most commonly the national DPA or an administrative court.

All these Member States reported that no such complaint have been addressed to the DPA, nor such cases brought before national courts since July 2016.

***Q22.** In case the request for correction or deletion of personal data concerning him or her is refused, the data subject may bring an action before the national courts or a complaint to the DPA for a review of the decision of refusal (Article 29(15)). Whom can data subjects address for a review of such decision of refusal according to national law? Please also precise how many complaints have been addressed to the DPA and/or how many cases have been brought to the courts in this regard since July 2016.*

The great majority of Member States informed that, in cases where a decision of refusal is taken in relation to requests for correction or deletion of data, data subjects can appeal this decision and ask for a review of their request by the competent national authority under national law, i.e. most commonly the national DPA or an administrative court.

All Member States reported that no such complaint have been addressed to the DPA, nor such cases brought before national courts since July 2016.

Q23. Throughout the proceedings for review of decisions of refusal, the DPA has the obligation to assist and, where requested, advice data subjects (Article 29(15)). How does the DPA provide assistance and advice to data subjects in practice in such proceedings? Please also precise in how many cases the DPA has provided assistance in such proceedings since July 2016.

The great majority of Member States informed that they have not yet been confronted with such proceedings for review of decisions of refusal. However, several Member States confirmed that in practice the DPA would provide assistance to data subjects in such proceedings

One Member State informed that the DPA provided advice regarding Eurodac in response to two separate requests for information from the same data subject.

5. Conclusions & Recommendations

Based on the analysis of the answers received, the Eurodac SCG welcomes the efforts that were made by competent national authorities in order to ensure the implementation of the new Eurodac rules and a smooth transition to the new Eurodac system by 20 July 2015.

Furthermore, the Group welcomes all in all the progress achieved so far and encourages the Member States to go further to ensure full compliance with the Eurodac Regulation in every detail as soon as possible. The Group welcomes in particular that:

- several Member States provide information to data subjects as to the collection of data about them and the access by law enforcement authorities in a thorough and comprehensive manner , aiming at making the information fully understandable to everyone and paying special attention to minors;
- the majority of Member States considers the model leaflets to be simple and easy to understand;
- all of the Member States have some procedure in place to ensure the right of access;

Nonetheless, the Group draws attention to some important features and urges those Members States that did not yet do so to take the following necessary steps to implement them:

- there are still some Member States that do not have a procedure in place to document the provision of information to data subjects;

- the use of the model leaflets is not yet spread in all of the Member States;
- some Member States have not designed a specific procedure to grant the right of access to Eurodac data;
- the procedures to grant the right to deletion and the right to correction must be updated and finalised in some Member States.

Brussels, 27.11.2019

Annex I. Questionnaire on data subjects rights

Questions on the right of information	
Q1	Could you explain how the obligation for Member States to inform data subjects in writing, and where necessary orally, of the collection of data about them (Article 29(1)), is applied in practice? Please explain the procedures for providing such information (timing, type of information) and provide privacy statement or other information material made available to data subjects.
Q2	Are the procedures for providing information to data subjects documented? If yes, please explain.
Q3	Is there any kind of check that the data subject have actually understood the information provided to them? If yes, please explain what such a check consists of.
Q4	Data subjects must be informed of the fact that their data could now also be accessed for law enforcement purposes by national competent authorities and/or Europol (Article 29(1)(b)). Please describe if and how data subjects are informed of the use of their data for law enforcement purposes.
Q5	In the case of minors, which specific measures have been taken to ensure that the information is provided in an age-appropriate manner in accordance with Article 29(2)?
Q6	Do you use the different model leaflets in annexes X to XIII of the Commission Implementing Regulation (EU) No 118/2014 to inform data subjects of their rights (Article 29(3))? If yes, in which languages these leaflets are offered to data subjects?
Q7	Do you think that the model leaflets are simple and have been drafted in a language that data subjects understand or are reasonably supposed to understand? If not, what could be improved in your opinion?
Q8	How are the model leaflets (or other leaflets) on data subjects' rights made available to data subjects in practice? Could you please specify at what stage, where and, if this information is available, how many leaflets have been given away since July 2016?
Q9	Does a specific website exist to inform data subjects about their rights?
Questions on the right of access	
Q10	Please describe the procedures in place for granting the right to access (e.g. formal requirements, time limits for replying, fees, possible exemptions) in accordance with Article 29(4).
Q11	When individuals request data relating to them, the competent authority shall keep records in the form of written documents that such requests were made and how they were addressed, and shall make these documents available to the national supervisory authorities without delay (Article 29(11)). How has this measure been implemented in practice?
Q12	How many requests for access have been recorded in accordance with Article 29(11) of the Eurodac Regulation since July 2016?
Q13	Are any other kind of requests - i.e. requests for information, deletion or erasure - recorded as well? If yes, please specify how many of such requests have been recorded.
Questions on the request to exercise data subjects' rights	
Q14	All requests made by data subjects to exercise their rights to access, correction or deletion shall contain all the necessary particulars to identify them, including fingerprints (Article 29(9)). Which data do data subjects have to provide with requests to exercise their data protection rights?
Q15	How is the obligation to provide fingerprints applied in practice? Do data subjects have to appear in person to have their fingerprints taken in order to confirm their identity?
Q16	How long does the controller keep the personal data of data subjects that are necessary to identify themselves?

Q17	Does the competent authority accept requests in another language than of the State in which the request is done? If yes, which languages does the competent authority accept and in which language is the answer to such request given?
Question on the procedures for granting the right to correction	
Q18	The correction of data that are factually inaccurate shall be carried out without excessive delay by the Member State which transmitted the data, in accordance with its laws, regulations and procedures. Please describe the procedure in place for granting the right to correction in accordance with Article 29(5) and (6).
Question on the procedures for granting the right to deletion	
Q19	The erasure of data that are recorded unlawfully shall be carried out without excessive delay by the Member State which transmitted the data, in accordance with its laws, regulations and procedures. Please describe the procedure in place for granting the right to deletion in accordance with Article 29(5) and (6).
Questions on the cooperation to ensure the rights on data protection	
Q20	How do the competent authorities cooperate actively to enforce the rights to correction and deletion (Article 29(10))?
Redress mechanisms	
Q21	In case the request for access is refused, data subjects may bring an action before the national courts or a complaint to the DPA for a review of the decision of refusal (Article 29(14)). Whom can data subjects address for a review of such decision of refusal according to national law? Please also precise how many complaints have been addressed to the DPA and/or how many cases have been brought to the courts in this regard since July 2016?
Q22	In case the request for correction or deletion of personal data concerning him or her is refused, the data subject may bring an action before the national courts or a complaint to the DPA for a review of the decision of refusal (Article 29(15)). Whom can data subjects address for a review of such decision of refusal according to national law? Please also precise how many complaints have been addressed to the DPA and/or how many cases have been brought to the courts in this regard since July 2016.
Q23	Throughout the proceedings for review of decisions of refusal, the DPA has the obligation to assist and, where requested, advise data subjects (Article 29(15)). How does the DPA provide assistance and advice to data subjects in practice in such proceedings? Please also precise in how many cases the DPA has provided assistance in such proceedings since July 2016.