



REPUBLIC OF ESTONIA  
DATA PROTECTION INSPECTORATE

Facebook Data Protection  
Compliance Team  
DPACASEWORK@FB.COM

Yours: nr

Our: 21.12.2022 nr 2.1.-1/22/2689

### **Request for cooperation**

Estonian Data Protection Authority received complainants about the Facebook account<sup>1</sup> that published personal data of other persons without any legal ground for it. Complaints are currently in the process in the Estonian Data Protection Inspectorate.

Complainants state that somebody created a fake account<sup>2</sup> in order to share their personal data (name and photo) without their prior consent. We have ascertained that there is no legal ground according to the Article 6 of the GDPR to process personal data of other persons (complainants).

According to the Facebook Community Standards the content published in Facebook should be authentic and also degradation of other users is strictly forbidden in Facebook.

Taking this into account we would appreciate if the Facebook control, if the account is authentic and if the Facebook identifies that the Facebook Community Standards were breached by the account the Facebook will remove the content or account.

Thank You for taking Your time to solve the problem.

Best regards  
Alissa Hmelnitskaja  
lawyer  
authorized by Director General

*P.S.* Please be informed that the personal data of the complainant should be classified as internal because of the fact that the information which contains personal data if enabling access to such information significantly breaches the inviolability of private life of the data subject (Public Information Act § 35(1)(12))<sup>3</sup>.

<sup>1</sup> <https://www.facebook.com/martin.saar.180>;

<sup>2</sup> <https://www.facebook.com/martin.saar.180>;

<sup>3</sup> <https://www.riigiteataja.ee/en/eli/522032022002/consolide>