



Position of the paper and print value chain on the EU General Data Protection review

September 2015

Our associations are part of the paper and print value chain and include paper manufacturing, paper converting, printing, postal services and direct marketing. We are all committed to safeguarding the protection of personal data.

Our industry – which ranges from the manufacturer to the distributor of direct mail – provides jobs to 3 million Europeans active in more than 120 000 companies and generates a turnover of over € 340 billion.

The review of the existing framework aims primarily at adapting the rules to the growing development of technology. It is essential that the new rules allow for the more ‘traditional’ side of the communication industry - i.e. postal direct mail – to keep its ability to process personal data.

Some of the proposals in the General Data Protection Regulation would considerably restrict direct marketing opportunities of industry and thereby have a serious impact on the ability for Europe to communicate while jeopardizing the existence of many of our companies in Europe.

In this decisive phase of the legislative procedure on the review of the European Data Protection legislation, we would like to highlight our key concerns and count on the negotiations to lead to a workable legislative framework, which:

Recognises the use of personal data in direct marketing as being carried out for a legitimate interest (*Recital 39 as proposed by the Council*)

Recognises the legitimate interest as legal basis for the further processing of data (*Article 6.4*)

Avoids excessive requirements on profiling (*Article 20*)

Acknowledges the legitimate interest of third parties and maintain the existing balance (*Article 6.1.f*)

Avoids the mandatory use of ambiguous graphical forms (*Article 13.2.a as proposed by the European Parliament*)

Avoids disproportionate administrative burden for SMEs

We trust the trilogue negotiations will lead to a balanced solution combining citizen's fundamental rights to data protection with standard business activities.

Contact:

CEPI – Confederation of European Paper Industries – www.cepi.org

FEDMA – Federation of European Direct and Interactive Marketing – www.fedma.org

FEPE – European Envelope Manufacturers Association – www.fepe.org

INTERGRAF – European Federation of Print and Digital Communication – www.intergraf.eu

POSTEUROP – European Postal Operators – www.posteurop.org