

Unit C3  
DG Justice and Consumers  
European Commission

19 June 2023

### **Legal opinion on the status of complainants**

Dear colleagues,

We wish to further support<sup>1</sup> your work to propose a regulation further specifying procedural rules relating to the enforcement of the General Data Protection Regulation.

To that end, ICCL has commissioned a legal opinion from Timelex, a distinguished Brussels law firm, that considers the merits of complainants being fully recognised as parties to proceedings.

We trust Timelex's opinion will assist in your deliberations, and attach it herewith.

In addition, we will be happy to organise a discussion about this, with Timelex too, if that would be of assistance.

Yours faithfully,

- Access Now
- ARTICLE 19
- Avaaz Foundation
- BEUC - The European Consumer Organisation
- Bits of Freedom
- Centre for Peace Studies, Croatia
- Civil Liberties Union for Europe
- Corporate Europe Observatory
- Defend Democracy
- DigiQ, Slovakia
- Digital Rights Ireland
- EDRi
- Ekō
- Electronic Frontier Norway
- FairVote UK
- IT-Pol Denmark
- Irish Council for Civil Liberties
- Norwegian Consumer Council
- Noyb
- Panoptikon Foundation
- Politiscope
- Privacy International
- Today is a new day, Institute for other studies, Slovenia
- Women's Lobby of Slovenia
- 5 Rights
- #jesuislà

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<sup>1</sup> See for example recent joint civil society letter sent to Vice President Jourová and Commissioner Reynders,  
[https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-079\\_Improvements\\_to\\_the\\_enforcement\\_of\\_the\\_GDPR.pdf](https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-079_Improvements_to_the_enforcement_of_the_GDPR.pdf)