

INTERGRAF

International confederation for printing and allied industries a.i.s.b.l.

PROPOSED GENERAL DATA PROTECTION REGULATION Voting recommendations of the European printing industry January 2013

In view of the upcoming vote on the draft Opinion on the draft General Data Protection Regulation of MEP Marielle Gallo in the Legal Affairs Committee, INTERGRAF wishes herewith to express its concerns on certain amendments which would threaten the **postal direct mail** industry.

INTERGRAF represents the interests of the European printing industry and is committed to safeguarding the protection of personal data. We acknowledge that recent globalisation trends and technology developments create the need for a review of the existing legal framework to ensure the privacy of personal data of European citizens. However the review process risks destabilising the more 'traditional' side of the communication industry, ie **postal direct mail**, which is not being questioned for its ability to protect personal data.

In order to safeguard the efficient legal framework, which is applicable to the postal direct mail for nearly two decades, it is crucial that

**the “legitimate interest” of the controller to process data
is being maintained.**

We therefore urge the Legal Affairs Committee to **REJECT**
amendments **81** and **135**.

Intergraf represents 23 national printing federations in 20 countries in Europe. Intergraf's main task is to promote and protect the interests of the printing and related industries.

The printing industry in the 27 European countries comprises some 120,000 firms and employs some 725,000 people. The turnover in the printing industry is about 88 billion EUR. The industry throughout Europe consists mainly of small enterprises, as 85% of them employ fewer than 20 persons.