

# Public consultation on the evaluation and modernisation of the legal framework for the enforcement of intellectual property rights: Intermediaries

Fields marked with \* are mandatory.

## Objectives and General Information

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The views expressed in this public consultation document may not be interpreted as stating an official position of the European Commission.

You are invited to read the privacy statement for information on how your personal data and contribution will be dealt with.

Please complete this section of the public consultation before moving to other sections.

Respondents with disabilities can request the questionnaire in .docx format and send their replies in email to the following address: [GROW-IPRCONSULTATION@ec.europa.eu](mailto:GROW-IPRCONSULTATION@ec.europa.eu).

If you are an association representing several other organisations and intend to gather the views of your members by circulating the questionnaire to them, please send us a request in email and we will send you the questionnaire in .docx format. However, we ask you to introduce the aggregated answers into EU Survey. In such cases we will not consider answers submitted in other channels than EU Survey.

If you want to submit position papers or other information in addition to the information you share with the Commission in EU Survey, please send them to [GROW-IPRCONSULTATION@ec.europa.eu](mailto:GROW-IPRCONSULTATION@ec.europa.eu) and make reference to the "Case Id" displayed after you have concluded the online questionnaire. This helps the Commission to properly identify your contribution.

Given the volume of this consultation, you may wish to download a PDF version before responding to the survey online.

### **\* Please enter your name/organisation and contact details (address, e-mail, website, phone)**

ISPA - Internet Service Providers Austria, Währinger Straße 3/18, 1090 Vienna, Austria  
[nona.parvanova@ispa.at](mailto:nona.parvanova@ispa.at), [maximilian.schubert@ispa.at](mailto:maximilian.schubert@ispa.at);

**\* Is your organisation registered in the Transparency Register of the European Commission and the European Parliament?**

In the interests of transparency, organisations (including, for example, NGOs, trade associations and commercial enterprises) are invited to provide the public with relevant information about themselves by registering in the Interest Representative Register and subscribing to its Code of Conduct.

If you are a registered organisation, please indicate your Register ID number. Your contribution will then be considered as representing the views of your organisation.

If your organisation is not registered, you have the opportunity to [register now](#). Then return to this page to submit your contribution as a registered organisation.

Submissions from organisations that choose not to register will be treated as 'individual contributions' unless they are recognized as representative stakeholders via relevant Treaty Provisions.

- Yes  
 No  
 Non-applicable

**\* Register ID number:**

56028372438-43

**In the interests of transparency, your contribution will be published on the Commission's website. How do you want it to appear?**

- Under the name supplied? (I consent to the publication of all the information in my contribution, and I declare that none of it is subject to copyright restrictions that would prevent publication.)  
 Anonymously? (I consent to the publication of all the information in my contribution except my name/the name of my organisation, and I declare that none of it is subject to copyright restrictions that would prevent publication).  
 No publication - your answer will not be published and in principle will not be considered.

**"Please note that your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001."**

## A. Identification

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**\* You are an intermediary or an association representing intermediaries?**

- Intermediary  
 Association

**\* What kind of intermediary service do you provide/represent?**

For the purpose of this consultation:

- "Advertising service provider"

Advertising agencies, advertising broker

- "Contract manufacturing service provider"

Contract manufacturing is an outsourcing of certain production activities previously performed by the manufacturer to a third-party.

This may concern certain components for the product or the assembly of the whole product.

- "Business-to-business data storage provider"

Data storage space and related management services for commercial user.

- "Business-to-consumer data storage provider"

File-storing or file-sharing services for personal media files and data

- "Content hosting platform"

Platforms providing to the user access to audio and video files, images or text documents.

- "Press and media company"

Newspaper, broadcaster

- |                                                                  |                                                                  |
|------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="radio"/> Advertising service provider               | <input type="radio"/> Business-to-business data storage provider |
| <input type="radio"/> Business-to-consumer data storage provider | <input type="radio"/> Content hosting platform                   |
| <input type="radio"/> Contract manufacturing service provider    | <input type="radio"/> DNS hosting service provider               |
| <input type="radio"/> Domain name registrar                      | <input type="radio"/> Domain name registry                       |
| <input type="radio"/> Internet Access Provider                   | <input type="radio"/> Mobile apps marketplace                    |
| <input type="radio"/> Online marketplace                         | <input checked="" type="radio"/> Other                           |
| <input type="radio"/> Payment service provider                   | <input type="radio"/> Press and media company                    |
| <input type="radio"/> Retailer                                   | <input type="radio"/> Search engine                              |
| <input type="radio"/> Social media platform                      | <input type="radio"/> Transport and logistics company            |
| <input type="radio"/> Wholesaler                                 |                                                                  |

**\* Please specify**

*500 character(s) maximum*

Business-to-business data storage provider  
Business-to-consumer data storage provider  
Content hosting platform  
DNS hosting service provider  
Domain name registrar  
Internet Access Provider  
Search engine  
Social media platform

**\* Please indicate your country of establishment?**

- |                                             |                                         |
|---------------------------------------------|-----------------------------------------|
| <input checked="" type="checkbox"/> Austria | <input type="checkbox"/> Belgium        |
| <input type="checkbox"/> Bulgaria           | <input type="checkbox"/> Croatia        |
| <input type="checkbox"/> Cyprus             | <input type="checkbox"/> Czech Republic |
| <input type="checkbox"/> Denmark            | <input type="checkbox"/> Estonia        |
| <input type="checkbox"/> Finland            | <input type="checkbox"/> France         |
| <input type="checkbox"/>                    | <input type="checkbox"/>                |

- |                                         |                                      |
|-----------------------------------------|--------------------------------------|
| <input type="checkbox"/> Germany        | <input type="checkbox"/> Greece      |
| <input type="checkbox"/> Hungary        | <input type="checkbox"/> Ireland     |
| <input type="checkbox"/> Italy          | <input type="checkbox"/> Latvia      |
| <input type="checkbox"/> Lithuania      | <input type="checkbox"/> Luxembourg  |
| <input type="checkbox"/> Malta          | <input type="checkbox"/> Netherlands |
| <input type="checkbox"/> Other          | <input type="checkbox"/> Poland      |
| <input type="checkbox"/> Portugal       | <input type="checkbox"/> Romania     |
| <input type="checkbox"/> Slovakia       | <input type="checkbox"/> Slovenia    |
| <input type="checkbox"/> Spain          | <input type="checkbox"/> Sweden      |
| <input type="checkbox"/> United Kingdom |                                      |

## B. Exposure to and impact of infringements

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**\* Do you experience use of your services by third parties resulting in infringement of IPR?**

- Yes  
 No

**How do you become aware of infringements?**

- |                                                   |                                                                                |
|---------------------------------------------------|--------------------------------------------------------------------------------|
| <input type="checkbox"/> In-house investigation   | <input type="checkbox"/> Use of external service provider                      |
| <input type="checkbox"/> Notification by customs  | <input type="checkbox"/> Notification by police or other enforcement authority |
| <input type="checkbox"/> Notification by customer | <input checked="" type="checkbox"/> Notification by rightholder                |
| <input checked="" type="checkbox"/> Other         | <input type="checkbox"/> No opinion                                            |

**\* Please specify**

*500 character(s) maximum*

Notification from legal entities purporting to represent IPR/Copyright owners.

**\* How do infringements impact on your business?**

- Loss of turnover  
 Reputational damage  
 Enforcement costs  
 Other  
 No opinion

**\* Please specify**

*500 character(s) maximum*

ISPs suffer reputational damage and enforcement costs. Diversion of internal technical and management resources as well as out-firm counsel to handle court orders related to alleged infringements committed by third parties through third parties services, while not being involved, not even as mere-conduit provider, into the illegal activities. Legal uncertainty relating to actions to be taken and related legal costs, as well as costs of implementing technical actions in their networks.

**\* What is the overall financial impact of IPR infringements?**

- Positive
- Negative
- No opinion

Please provide an estimation of the impact in percentage of the overall turnover:

 %

**\* How did IP infringements develop over last 10 years?**

- Decreased
- Increased
- Unchanged
- Don't know

Please explain:

*1500 character(s) maximum*

ISPA does not have any concrete figures or data on the development of IP infringements online. The following is only based on general observations. During the last decade, audiovisual media services developed enormously and new business models emerged. These services (eg. Spotify, Deezer, Soundcloud, Netflix, Steam, among many others) meet demands by clients and help to create a legal way to access content online at low costs. By creating those streaming platforms and on-demand-services rightholders finally paved an easy way for customers to find and use their preferred content online. These developments helped to decrease the over-all numbers of IP-infringements online, simply because there is no more need for illegal downloads. At the same time, the gaming industry created online solutions to download or play games using online services. This can also be seen as a proper response to a demand being made by customers.

## C. Functioning of key provisions of Directive 2004/48/EC on the enforcement of intellectual property rights

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This section aims to provide the Commission with stakeholder' views, opinions and information about the functioning of the overall enforcement framework and of key provisions of IPRED.

### C.1. Overall functioning of the enforcement framework

**\* Do you think that the existing rules have helped effectively in protecting IP and preventing IP infringements?**

- Yes
- No
- No opinion

Please explain:

*1500 character(s) maximum*

In general, the existing rules of the directive have helped to protect intellectual property online. Combined with other EU-regulations and directives, the given legal framework balances the various interests in that aspect. Therefore, the main principles for the enforcement directive should remain unchanged. ISPA Austria points out that, the lack of harmonisation of the EU Members' copyright legislations has hampered the possibility of actually enforcing a "notice-and-takedown" approach though. Despite the directive, the rights holders have wrongly gone after ISPs alleging they are "intermediaries" - when, in fact, they are not financially in the value chain and are not truly intermediaries - rather than going after the infringers and seeking compensation or prosecution.

**\* Do you consider that the measures and remedies provided for in the Directive are applied in a homogeneous manner across the MS?**

- Yes  
 No  
 No opinion

**\* Please explain:**

*1500 character(s) maximum*

The measures are largely unworkable because the key issue is not tackled: facilitating the IPR owner to find and seek damages/prosecute the actual infringer.

As stated above, the legal status of copyright offenses differs for each Member State. The first step to ensure a homogeneous enforcement of the directive should be the clear drawing of a line between what can be settled with alternative dispute resolutions or the "notice-and-takedown" approach and what a public prosecutor should handle.

The IRIS report "Copyright enforcement online : Policies and mechanisms" (IRIS plus 2015-3) demonstrates that the measures and remedies provided by the directive are not applied in a homogenous manner across member states. Therefore, instead of altering the directive, the commission should undertake an impact assessment of the different applications in different member states.

## C.2. Measures, procedures and remedies provided for by IPRED

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Responses to this section should be based on the overall experience with the measures, procedures and remedies provided for by IPRED as implemented and applied at national level. If appropriate please specify in your response, to the extent possible, particular national issues or practices and the jurisdiction concerned.

### C.2.1. Right of information (Article 8)

**Have you received a request for information?**

- Yes
- No

**\* Do you consider the application of the rules on the right of information to be clear and unambiguous?**

- Yes
- No
- No opinion

**\* In view of your experience with the application of the right of information do you think that the existing rules have helped effectively in protecting IP and preventing IPR infringements?**

- Yes
- No
- No opinion

**\* Please explain:**

*1500 character(s) maximum*

The right of information gives rightholders the opportunity to track infringements of their content on a commercial basis and to trace violators. In the jurisdiction, the main point of discussion in the past has been the interpretation of the term "on a commercial basis". Jurisdiction tended to interpret this broadly, causing harsh verdicts even for small scale infringements. This might not have been the intention of the legislator. In Germany it had the side-effect of creating a glut of adhortatory letters too, causing german legislation to change in that point, ceasing the glut. Since then, the right of information maintains the balance between the interests of rightholders and the interests of intermediaries and private users. This balance, which in past discussions was often questioned by rightholders wanting to introduce much harsher and stricter regulations, should remain untouched and unaltered.

**\* In view of your experience with the application of the right of information do you see a need to adjust the provisions for the application of that measure?**

- Yes
- No
- No opinion

**\* Do you see a need to clarify the criteria used to reconcile the requirements of the right to respect for private life/right to protection of personal data on the one hand and the right to effective remedy on the other hand when assessing requests for disclosure of personal data for the purpose of initiating judicial proceedings?**

- Yes
- No
- No opinion

\* Please explain:

1500 character(s) maximum

The high level of fundamental rights protection in Austria bars Austrian ISPs from providing civil courts with data information about their users in cases of e.g. divorce or insurance cases, or IPR-infringements. The right of information in Austria is restricted to criminal offences, therefore Austrian ISPs do not aim for harmonisation of the right of information, which might oblige them to do so in the future.

### C.2.2. Procedures and courts, damages and legal costs (Articles 3, 13 and 14)

**Have you been subject to legal action in cases of IPR infringements?**

- Yes, as an applicant
- Yes, as a defendant
- No

**Did you claim reimbursement of legal costs incurred in proceedings related to IPR infringements?**

- Yes
- No

**Have you been subject to a claim for damages by an IP rightholder for alleged active and knowing facilitation of IPR infringements?**

- Yes
- No

\* **In view of your experience with the application of the rules for the reimbursement of legal costs do you see a need to adjust the application of that measure?**

- Yes
- No
- No opinion

\* **In view of your experience with the application of the rules for the calculation of damages do you see a need to adjust the application of that measure?**

- Yes
- No
- No opinion

### C.2.3. Provisional and precautionary measures and injunctions (Articles 9 and 11)

**Provisional and precautionary measures**

**Have you been subject to an application for provisional and precautionary measures in case of an alleged IPR infringement?**



- Yes
- No

## Injunctions

Have you been subject to an injunction in case of an IPR infringement?

- Yes
- No

In your experience what are the main reasons for applying for an injunction?

	Very relevant	Relevant	Less relevant	Not relevant	Don't know
Block access to infringing content online	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stay down of infringing content online	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adopt technical measures such as filtering	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
De-indexing infringing websites	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Permanent termination of domain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Permanent termination of subscriber account	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discontinue providing payment services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discontinue providing advertising services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discontinue providing transport services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discontinue manufacturing of infringing products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Termination of lease for commercial premises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

\* In view of your experience with the application of the rules for provisional/permanent injunctions do you see a need to adjust the application of that measure?

- Yes
- No
- No opinion

**\* Should the Directive explicitly establish that all types of intermediaries can be enjoined?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

The term "intermediary" is used in a very broad sense within this consultation. Therefore, as a first step, one should clarify the definition of the term "intermediary", also in respect to the usage of that very term in other consultations, regulations or directives. It might not be appropriate to enjoin each and every industry mentioned.

As for the internet industry, there is a clear difference between content-, host- and access providers and a clear liability regime based in the e-commerce directive (2000/31/EC). The directive states that access providers are merely providing access to a communications network and transmitting information via that network without having control over any activities of their customers (Art. 12). There is clearly no obligation to monitor online activity (Art. 15). The directive further states that host providers are not responsible for any information stored by their customers before having actual knowledge of alleged illegal activity (Art. 14). Therefore, it does not seem appropriate to enjoin every online intermediary. ISPA always advocated in favour of deleting instead of blocking illegal content online and will continue to do so, seeing this as a suitable strategy to fight infringements of intellectual property online as well.

**\* Should the Directive explicitly establish that no specific liability or responsibility (violation of any duty of care) of the intermediary is required to issue an injunction?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

There is no legal ground to affirm such a principle. By doing so, it would follow that all and every kind of infringement, whatever the issue (libel, theft, moneylaundering and so on), would require the very same specific duty. Again, if an ISP is actually involved into illicit activities, current provisions already offer all the remedies.

The issue of an injunction should always follow certain rules and regulations by law. There should be a certain threshold to pass before trying to enjoin intermediaries. An injunction should always be reasonable, appropriate and expedient.

**\* Should the Directive explicitly establish that national courts must be allowed to order**

**intermediaries to take measures aimed not only at bringing to an end infringements already committed against IPR using their services, but also at preventing further infringements?**

- Yes
- No
- No opinion

Please explain:

*1500 character(s) maximum*

Courts can only decide if something that has been undertaken is against the law or not. By letting a court issue an order for future infringements, we would dismantle the basis of our legal systems, if forcing ISPs to decide on their own what constitutes an "infringement".

ISPA always advocated against preventive court orders. As mentioned above, it is very important for host and access providers not to be liable for any content that their customers store, consume or transmit. To prevent possible future infringements of intellectual property online, providers would have to control all data being stored or transmitted via their networks. That would result in a flagrant breach of the telecommunications secrecy and the right to information of every citizen. This is clearly unjustified under any circumstances. Furthermore this approach would contradict the reasoning of the ECJ in the L'Oreal Case, C-324/09.

**\* In that respect should the Directive establish criteria on how preventing further infringements is to be undertaken (without establishing a general monitoring obligation under the E-Commerce Directive)?**

- Yes
- No
- No opinion

Please explain:

*1500 character(s) maximum*

ISPs cannot be part of an activity that should be carefully dealt with by judges. It should also be emphasised that IPR enforcement measures can have an immensely detrimental impact on the ISP sector - effectively amounting up to a secondary duty to monitor - and on the development of the Internet in general. For internet service providers, there is no way to undertake preventive measures without defying the e-commerce directive. The liability regime established in the e-commerce directive is one of the cornerstones for the evolution and the success of each and every internet-based enterprise and should therefore not be altered. The IPRE directive should not establish any criteria or liability that contradicts or widens the scope of the e-commerce directive.

**\* Do you see a need for criteria defining the proportionality of an injunction?**

- Yes

- No
- No opinion

**\* Do you see a need for a definition of the term "intermediary" in the Directive?**

- Yes
- No
- No opinion

**\* Please explain:**

*1500 character(s) maximum*

IPRED should take into account the distinctions made by the Ecommerce Directive, which already defines three kind of intermediaries. As mentioned above, the term "intermediary" is used in a very broad sense within this consultation. If an intermediary is defined as every third party that can be involved in an infringement of copyright (see also section D1), the definition is much too vague. One should keep in mind the existing legal framework. The IPRE directive should not contradict, alter or widen well-established rules, regulations and liability regimes.

**\* Do you see a need for a clarification on how to balance the effective implementation of a measure and the right to freedom of information of users in case of a provisional measure or injunction prohibiting an internet service provider from allowing its customers access to allegedly IPR infringing material without specifying the measures which that service provider must take?**

- Yes
- No
- No opinion

**Please explain:**

*1500 character(s) maximum*

In ISPA's opinion no injunction should be granted if the effect is to involve innocent third parties (i.e. shutting down a whole IP class to block a single website, thus obscuring other, non-involved resources). As mentioned above, ISPA always advocated against access blocking and favoures the deletion of illegal content instead. Therefore, ISPA does not see the necessity for any provisional measures. The directive should refrain from establishing any such principle.

**\* Do you see a need for other amendments to the provisions on provisional and precautionary measures and on injunctions?**

- Yes
- No
- No opinion

## C.2.4. Other issues

**\* Are there any other provisions of the Directive which, in your view, would need to be improved?**

- Yes  
 No  
 No opinion

**\* Please explain:**

*3000 character(s) maximum*

Article 3(1) - General Obligation - stipulates that the Member States have to provide for measures, procedures and remedies necessary to ensure the enforcement of the intellectual property rights covered by the Directive. Those measures need to be fair and equitable and not unnecessarily complicated or costly, or entail unreasonable time-limits or unwarranted delays. Although the Directive attaches conditions/limits to the impact of these measures, in practice, this has not always been followed through by the Member States.

Article 6(1) - Evidence - states, in relevant part, that the competent judicial authorities may order an opposing party to provide evidence in its control, which the claiming party has specified in substantiating its claims, to be presented by the opposing party.

This kind of procedure should be made possibly by low cost data disclosure court orders and affected ISPs should have cost reimbursement for provision of such kind of data.

## D. Issues outside the scope of the current legal framework

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### D.1. Role of intermediaries in IPR enforcement and the prevention of IPR infringements

**\* Do you believe that intermediary service providers should play an important role in enforcing IPR?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

Online IPR infringements should be solely be a matter for the infringer and the IP owner.

**\* Do you cooperate with rightholders or rightholders' association in the protection and enforcement of IPR?**

- Yes

No

**\* Why do you not cooperate with rightholders?**

- Not aware of the possibility
- Costs
- Negative experience
- Other

**\* Please specify**

*500 character(s) maximum*

Because they are not acting against the infringer but trying to pin the responsibility on the innocent ISP intermediary.

**\* On the basis of your experience what are the main challenges in establishing a successful cooperation between rightholders and intermediaries?**

- Economic interests (e.g. additional costs)
- Technology
- Specific regulatory requirements
- Other
- No opinion

**\* Please specify**

*500 character(s) maximum*

The main reason is the lack of appropriate legislation, rendering cooperation b/w rightholders und intermediaries possible without admitting liability or violation the fundamental rights of its users. The infringement is not the responsibility of the ISP (access or hosting) it is that of the infringer. Voluntary cooperation practices b/w rightholders and intermediaries would have to fullfill an enourmos threshold in respect to transparency and guarantee the possibility of judiciary oversight.

**\* In your opinion does the voluntary involvement of intermediary service providers in enforcing IPR have or might have a negative impact on fundamental rights?**

- Yes
- No
- No opinion

**\* How could fundamental rights be negatively affected?**

- Limitation of freedom of expression
- Limitation of freedom to conduct business
- Limitation of the right to due process
- Limitation to the dissemination of legal content
- Other

## Other comments on the role of intermediaries in IPR enforcement and the prevention of IPR infringements:

*3000 character(s) maximum*

As mentioned above - ISP intermediaries play no part in the infringement - unless they own and operate a service of some nature that actually is in itself infringing.

## D.2 Other issues

**\* Do you identify any other issue outside the scope of the current legal framework that should be considered in view of the intention to modernise the enforcement of IPR?**

- Yes  
 No

**\* Please explain:**

*3000 character(s) maximum*

EU-Memberstates need a simple and low cost alternative to current systems so legal action in cases of IPR infringement becomes between rightholder and infringer only.

## E. Other comments

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**\* E. Do you have any other comments?**

- Yes  
 No

### Useful links

Enforcement of intellectual property rights

([http://ec.europa.eu/growth/industry/intellectual-property/enforcement/index\\_en.htm](http://ec.europa.eu/growth/industry/intellectual-property/enforcement/index_en.htm) )

The Single Market Strategy ([http://europa.eu/rapid/press-release\\_MEMO-15-5910\\_en.htm](http://europa.eu/rapid/press-release_MEMO-15-5910_en.htm) )

The Digital Single Market Strategy ([http://europa.eu/rapid/press-release\\_MEMO-15-4920\\_en.htm](http://europa.eu/rapid/press-release_MEMO-15-4920_en.htm) )

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### Background Documents

[DE] Datenschutzerklärung (</eusurvey/files/dd8b2d68-19ef-46c1-94c2-5dd4895a22e6>)

[DE] Hintergrund (</eusurvey/files/26d0940d-472f-4175-b55e-474f9aaf7931>)

- [EN] Background information (/eusurvey/files/a5da5dca-4fed-4d7d-a452-a326303ac265)
- [EN] Privacy statement (/eusurvey/files/76e773ff-7057-476a-8440-0cdac45a21df)
- [ES] Antecedentes (/eusurvey/files/a2ffeaea-5b75-454e-a65f-741d784e4cf5)
- [ES] Declaración de confidencialidad (/eusurvey/files/567d7bec-dabe-40a6-9598-98de4eeace82)
- [FR] Contexte (/eusurvey/files/81aa2212-332b-4808-9059-fde91b1043a9)
- [FR] Déclaration relative à la protection de la vie privée (/eusurvey/files/af24e5d2-8a6d-4867-bb8a-8af697c057b5)
- [IT] Contesto (/eusurvey/files/c5544db2-47c3-459b-bc63-d750ace25279)
- [IT] Informativa sulla privacy (/eusurvey/files/f4e8e5fe-5739-4867-b2aa-1f8327318ed5)
- [PL] Kontekst (/eusurvey/files/4c3e015f-c229-46a6-9330-0aa8b594df45)
- [PL] Oświadczenie o ochronie prywatności (/eusurvey/files/3d746855-55a0-41ff-9ed0-f66f43c30c22)
- 

## Contact

✉ [GROW-IPRCONSULTATION@ec.europa.eu](mailto:GROW-IPRCONSULTATION@ec.europa.eu)

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