



noyb – European Center for Digital Rights
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1140 Vienna,
Austria

Data Protection
Authority Barichgasse
40-42 1030 Vienna

By email: dsb@dsb.gv.at

Vienna, July 30,
2026

noyb Case Number: C107

Complainant:



Represented pursuant to
Article 80(1) of the GDPR
by:

noyb – European Center for Digital Rights
Goldschlagstraße 172/4/3/2, 1140 Vienna

Respondent:

dict.cc GmbH
Erdbergstr. 10/55
1030 Vienna,
Austria

Re:

Article 4(11), 5, and 6 of the GDPR

COMPLAINT PURSUANT TO ART. 77(1) OF THE GDPR

1. REPRESENTATION

1. *noyb* – European Center for Digital Rights is a nonprofit organization active in the field of protecting the rights and freedoms of data subjects with regard to the protection of their personal data, with its registered office at Goldschlagstraße 172/4/2, 1140 Vienna, Austria, and with registration number ZVR: 1354838270 (hereinafter “noyb”) (**Appendix 1**).
2. *noyb* represents the complainant pursuant to Article 80(1) of the GDPR (**Appendix 2**).

2. FACTS

2.1. Website Visit

3. On July 7, 2026, at 2:45 p.m., the complainant visited the website www.dict.cc.
4. A banner was displayed on the website.



Figure 1: Screenshot of the banner on dict.cc on July 7, 2026. Taken during a separate visit (Appendix 3).

5. The complainant clicked on “Accept All and Visit Website” to access the actual website and search for translations there.

6. The complainant recorded his visit using video and HAR files (**Appendix 4, Appendix 5**).

2.2. Information on “Partners”

7. The banner’s submenu contains information about the 1,721 (!) partners who receive the complainant’s personal data.
8. Their privacy notices and directives are often available only in English. See, for example, the privacy directive of Vibe Advertising Inc. (<https://www.vibe.co/legal/privacy-directive>).
9. According to the information provided by the respondent, personal data is processed for advertising purposes and is also shared by the complainant’s partners with other entities (see, e.g., <https://advertising.inmobi.com/privacy-policy>). These entities may, in turn, transfer the data to thousands of other controllers. This is common practice in automated online advertising (see CJEU, C-604/22, IAB Europe, paras. 22–23).

3. GROUNDS FOR THE COMPLAINT

3.1. Violations

10. The respondent has violated the following provisions of the GDPR:
 - (a) Article 5(1)(a) of the GDPR: The respondent failed to provide the complainant with transparent information. Furthermore, there was no valid legal basis for the data processing.
 - (b) Article 6(1) of the GDPR: The respondent processed the complainant’s personal data without a valid legal basis, in particular without valid consent.

3.2. No Legal Basis for Data Processing

3.2.1. Principle of Transparency

11. Pursuant to Article 5(1)(a) of the GDPR, personal data must be “processed lawfully, with fairness, and in a transparent manner in relation to the data subject.”

12. Recital 58 of the GDPR states:

“The principle of transparency requires that information intended for the public or the data subject be precise, easily accessible, and understandable, and be written in clear and simple language, with additional visual elements used where appropriate. [...] This applies in particular to situations where the large number of parties involved and the complexity of the technology required make it difficult for the data subject to recognize and understand whether, by whom, and for what purpose personal data concerning them is being collected, such as in the case of online advertising. [...]” (Emphasis added)

13. The Article 29 Data Protection Working Party commented on this principle as follows (Guidelines on transparency under Regulation 2016/679, WP260 rev.01, paras. 9–10):

“The requirement that information be ‘comprehensible’ means that it should be understandable to a typical member of the target audience.” – para. 9

“A central consideration in the transparency principle outlined in these provisions is that the data subject should be able to ascertain the scope and consequences of the processing in advance and should not be surprised later by the manner in which their personal data has been used. This is also an important aspect of the principle of good faith under article 5(1) of the GDPR [...]” – para. 10

3.2.2. Informed Consent

14. According to article 4(11) of the GDPR, consent means *“any freely given, specific, informed, and unambiguous indication of the data subject’s wishes.”* (Emphasis added)

15. The requirement that consent be informed is closely linked to the principle of transparency.

16. With regard to informed consent, the CJEU has held that:

“[...] the clear and comprehensive information must enable the User to easily determine the consequences of any consent he or she may give and ensure that consent is given with full knowledge of the facts. It must be clearly understandable and detailed enough to enable the User to understand how the cookies used function.”

- C-673/17, Planet49, para. 74 (emphasis added)

“[...] the mere fact that those customers signed the contracts with the checkbox marked is not, in and of itself, sufficient to establish such consent

unless there is evidence that this clause was actually read and understood.”

- C-61/19, Orange România SA, para. 46 (emphasis added)

17. In the corresponding Opinion, the Advocate General stated:

“There must be absolutely no doubt that the data subject was sufficiently informed.”

- Opinion of Advocate General M. Szpunar, C-61/19, Orange România SA, para. 46

18. The EDPB stated the following regarding informed consent (Guidelines 05/2020, Section 1.1, para. 62):

“It is of fundamental importance to provide data subjects with information before their consent is obtained, in order to enable them to make informed decisions, to understand what they are consenting to, and so that they can, for example, exercise their right to withdraw consent. If the controller does not provide accessible information, User control becomes illusory. In that case, consent is an invalid basis for processing.” (Emphasis added)

3.2.3. Application to the Case at Hand

19. The complainant was asked to “consent” to the processing of his personal data by the respondent and 1,721 other entities.

20. If the complainant were to spend one (1) minute per partner gathering information, this would be far from sufficient to even begin to read the respective privacy notices, let alone fully understand how his data is processed. For this alone, however, the complainant would need 1,721 minutes—an incredible 28 hours and 41 minutes.

21. In reality, the time required to read (and understand) all the privacy policies is likely to be much greater. According to a reading time calculator ^{at(1)}, an average reader would need significantly more time to read the privacy policies of the respondent’s partners. For the first three partners listed in the respondent’s banner, the following times apply:

¹<https://wordstotime.com/>

Partner	Link	Reading Time ("Silent Reading," 250 words/minute)
Exponential Interactive, Inc. d/b/a VDX.tv	https://www.vdx.tv/policies/privacy	~ 12 minutes
Captify Technologies Limited	https://www.captifytechnologies.com/privacy-notice/	~ 32 minutes
Roq.ad GmbH	https://roq.ad/privacy-policy	~ 36 minutes
		~ 80 minutes

22. Simply reading three privacy policies therefore takes more than an hour. Even under the extremely conservative assumption that understanding the data processing practices for each “partner” takes an average of only six minutes ², with 1,721 partners that would amount to a total of 10,326 minutes, or 172 hours and 5 minutes. That corresponds to 7 days and 4 hours—more than a full week—just to understand the privacy implications of a single website.

23. It is inconceivable that situations such as the one at hand would “enable him to *easily* determine the consequences of any consent he may have given” (CJEU, C-673/17, Planet49, para. 74, emphasis added). It is practically impossible to “understand” (see CJEU, C-61/19, Orange România SA, para. 46).

24. To make matters worse, the respondent’s “partners” in turn . . . As a result, results a chain of thousands of “partners,” which the data of the complainant processing. The complainant was not provided with any information regarding the entire chain of “partners” who process his data. Assuming, then, that each of the 1,721 partners with additional 100 “partners”

²In a study, the enterprise NordVPN estimates that it takes an average of 27 minutes to read a privacy policy. According to NordVPN, it would take 43 hours per month (!) just to read the privacy policies of all visited websites (<https://nordvpn.com/de/blog/nordvpn-studie-datenschutzrichtlinien-lesen/>). This figure does not yet include the partners.

If all of them were involved, that would result in 172,100 recipients to whom consent is to be granted with a single click (!).

25. In short: The respondent appears to be obtaining “blanket consent” intended to cover data processing by thousands of (including unknown) entities.
26. Under these circumstances, the complainant had no real opportunity to fully understand the scope of the processing of his data (Article 29 Working Party, Guidelines on Transparency under Regulation 2016/679, WP260 rev.01, paras. 9–10). The complainant was unable to *“identify and understand whether, by whom, and for what purpose”* (Recital 58) his personal data was being processed.
27. Therefore, the complainant could not provide informed consent within the meaning of Article 4(11) of the GDPR. Consequently, there is no legal basis under Article 6(1) of the GDPR for the data processing in question.
28. This also constitutes a violation of the principles of transparency and lawfulness under article 5(1)(a) of the GDPR.

4. MOTIONS AND RECOMMENDATIONS

4.1. Request for a Declaration

29. The complainant requests that the complaint be upheld and that it be determined that the respondent
- in violation of Article 6(1) GDPR has personal data of the complainant without a legal basis for processing.
 - in violation of Article 5(1)(a) GDPR the personal data of the complainant unlawfully and without transparency.

4.2. Request for Relief

30. The complainant requests that the respondent be ordered, pursuant to article 58(2) (g) of the GDPR, (i) delete the complainant’s unlawfully processed personal data and (ii) inform any recipient to whom the complainant’s personal data has been disclosed of this erasure.

31. The complainant requests that the respondent be prohibited, pursuant to Article 58(2)(f) of the GDPR, from processing his personal data without obtaining valid consent.

4.3. Proposal to Impose an Administrative Fine

32. The complainant requests that an administrative fine be imposed on the respondent that is effective, proportionate, and dissuasive. The respondent appears to generate its annual revenue of several million euros and its annual profit of at least several hundred thousand euros (**Appendix 6**) primarily through (online) advertising (**Appendix 7**, p. 3).

5. CONTACT

33. Communication between noyb and the DPA in connection with these proceedings may be conducted via email to [REDACTED], referencing Case C107.