

*DATA PROTECTION
SUPERVISORY AUTHORITY
OF JEHOVAH'S WITNESSES*

Data Protection and
Freedom of Information
2018 Activity Report

2018 Activity Report

From the *Data Protection Supervisory Authority of Jehovah's Witnesses*

The *Data Protection Supervisory Authority of Jehovah's Witnesses* must present an annual report on its operations to the Branch Committee and the public (§ 24(6) Data Protection Act of Jehovah's Witnesses). This report covers the period from May 2018 to May 2019.

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CONTENTS

Index of Abbreviations	6
Introduction	7 – 8
1. Areas of Focus	11 – 15
a. New Data Protection Act – DSGJZ	11 – 12
b. Relationship with the GDPR	13 – 15
2. Data Protection under Ecclesiastical Law	17 – 19
a. Development of data protection in the ecclesiastical law of <i>Jehovas Zeugen in Deutschland</i>	17
b. Current developments	18 – 19
3. Facts and Figures	21 – 25
a. Statistics	21 – 24
b. Inspections	25
4. Glossary	27 – 28

NOTE:

The Glossary (at the end of the Activity Report) provides explanations of various specialised terms. When the first appearance of a term is highlighted in a different colour in the main text (for example, [personal data](#)), this indicates that a more detailed explanation is available in the Glossary.

INDEX OF ABBREVIATIONS

CJEU	Court of Justice of the European Union
DSGJZ	Data Protection Act of Jehovah's Witnesses
DSK	Conference of Independent Data Protection Federal and State Commissioners
EU	European Union
GDPR	General Data Protection Regulation of the European Union
K.d.ö.R.	Corporation under public law
StGB	German Criminal Code
StPO	German Code of Criminal Procedure
StRG	Statutes of the Religious Association: <i>Jehovas Zeugen in Deutschland</i>
TFEU	Treaty on the Functioning of the European Union
VersO	Congregation Charter

Introduction

Over the past year (2018), many data protection innovations were ushered in throughout Europe. On 25 May 2018, the General Data Protection Regulation ([GDPR](#)) became directly applicable in all EU Member States. This legal text marked the first time that a complete field of law became binding and was regulated in detail for all EU Member States. In Article 91 GDPR, a significant regulation stands out with respect to ecclesiastical law:

“Where in a Member State, churches and religious associations or communities apply, at the time of entry into force of this Regulation, comprehensive rules relating to the protection of natural persons with regard to processing, such rules may continue to apply, provided that they are brought into line with this Regulation.”

Hence, Article 91 GDPR constitutes the interface between the high standards of the GDPR and the religion’s own internal law, particularly the revised Data Protection Act of Jehovah’s Witnesses ([DSGJZ](#)).

However, in the religious association of *Jehovas Zeugen in Deutschland*, K.d.ö.R, the protection of the right of personality has always been based on the view of humanity that the religious association and its members derive from their understanding of the Bible. A high value has always been placed on maintaining the utmost confidentiality regarding the personal circumstances of the individual – especially in view of the trust-based pastoral relationship (Proverbs 20:19; 25:9). Pastoral activity presupposes that a congregant can freely confide in another and openly express problems (Proverbs 15:22). The need to protect privacy is a prerequisite for the religious association’s fundamental principles to be realised (§ 13(1) StRG; § 3(5), subparagraphs 1, 2 VersO).

Therefore, the religious association has been making provisions in its religious law for decades to ensure that personal data is protected — even before data protection laws were established at the federal, federal state and EU levels. The decades of bitter persecution under the National Socialist regime and the German Democratic Republic (East Germany) taught Jehovah’s Witnesses the importance of protecting privacy and of not disclosing personal data. The persecution, bans and deprivation of rights which persist in some parts of the world give rise to the need for a global standard to safeguard confidentiality.

Regardless of the legal forms of the religious association’s various structural divisions and facilities (§ 5 StRG), all are subject to the [ecclesiastical law](#) (Preamble, par. 4 StRG). This forms the basis for the actions [of the religious association]. The preservation of each individual’s right to personality is guaranteed by means of the religious association’s own appropriate data protection policy. This Data Protection Act of Jehovah’s Witnesses (DSGJZ) was adopted on the basis of the constitutionally guaranteed right of *Jehovas Zeugen in Deutschland* to independently organise and administer its own affairs within the limits of the law applicable to all. This right is also respected

and set out in European law in Article 91 and Recital 165 GDPR and Article 17 TFEU. In exercising this right, the DSGJZ establishes compatibility with the GDPR.

The *Data Protection Supervisory Authority of Jehovah's Witnesses* was established on 24 May 2018. It supervises the religious association's compliance with its own data protection regulations. The religious association is thus supervised by an independent supervisory authority (Article 91(2) GDPR). This annual report will provide information about the activities of the authority. It should clarify how the DSGJZ grants the same level of data protection that applies throughout the EU. It will also present the accomplishments of the authority over the past year and forecast the development of the authority's future work.

Berlin, June 2019

Andreas Schlack
Board

1

Areas of Focus

1. Areas of Focus

a. New Data Protection Act – DSGJZ

Shortly after being awarded corporation rights, the religious association issued its own Data Protection Act that entered into force on 13 February 2008, and the new version on 1 April 2011, and guaranteed religious adherents and all others that their data would be handled in a trustworthy and at the same time secure manner. On 21 May 2018, a new version of DSGJZ was published, which came into force on 24 May 2018.

According to § 1(1) DSGJZ, the purpose of the DSGJZ is to protect individuals from having their privacy violated by the processing of **personal data**, while at the same time enabling the secure and free flow of such data.

This purpose is secured primarily by granting rights. The DSGJZ establishes the right to transparency and the right to access information, the right to rectification, the right to erasure (“right to be forgotten”), the right to restriction of processing, the right to data portability, as well as the right to file objections and complaints with the *Data Protection Supervisory Authority of Jehovah’s Witnesses*.

(1) Rights to Transparency and to Access Information

In order for a member of the religious association or a third party to exercise his/its own rights, it is essential to know what personal data are being stored and processed. In order to meet this need – in this increasingly digital world – the DSGJZ laid down the duty to have transparent information in § 7 and § 8. In this respect, the DSGJZ is based on the standard that has been established throughout Europe by the GDPR. In addition, according to § 9 DSGJZ, every data subject has the right to access information about his data.

(2) Right to Rectification

Since there is no justification for processing incorrect data, it is essential to make provision for the rectification of erroneous data. This right is ensured under § 10 DSGJZ. However, the DSGJZ also strikes a balance between the credibility of the existing data and the interest of each data subject. Thus, the incorrectness of the data is a prerequisite for its rectification. The data subject must therefore explain the extent to which the data is incorrect.¹

¹ Cf. Stade Administrative Court, decision of 9 October 2018 – 1 B 1918/18.

(3) Right to Erasure

When certain grounds listed in the DSGJZ are indicated, the data subject has the right to demand the erasure of his personal data in accordance with § 11 DSGJZ. This is particularly the case if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, or if consent is withdrawn and there are no overriding legitimate grounds for the processing.

(4) Right to Restriction of Processing

When disputes arise regarding the lawfulness of the processing of personal data, but erasure is not possible for reasons stated in the law, the data subject can, under certain circumstances, have the processing of his data restricted (§ 12 DSGJZ). This provides additional protection for all data subjects and prevents data – apart from their being stored – from being further processed.

(5) Right to Data Portability

Newly introduced into the DSGJZ, under § 14 DSGJZ, in line with the GDPR standard is the right to data portability – the right to obtain, under certain conditions, a copy of one's own data in a common and machine-readable file format. This should enable the data subject to transmit his data to another data controller.

(6) Right to Object

In general, the DSGJZ grants data subjects the right to object to the processing of their personal data in § 15 DSGJZ. In accordance with § 15(3) DSGJZ, the data subject must be notified of this right by the time of the first communication at the latest.

(7) Right to Lodge Complaints

The DSGJZ naturally grants legal protection to data subjects. Any data subject can contact a data controller and assert his rights. If the data subject believes that his rights have been violated, he has the right to lodge a complaint with the Data Protection Supervisory Authority in accordance with § 26 DSGJZ, which in turn monitors that data controllers comply with all data protection laws.

The DSGJZ thus has a variety of both familiar and new options for every data subject that ensures confidential and lawful handling of their personal data. In particular, due to the typical closeness between a religious association and its members, the processing of personal data is carried out in accordance with the data-protection principles in § 3(1) DSGJZ of lawfulness, of processing in accordance with [fairness](#), [transparency](#), [purpose limitation](#), [data minimisation](#), [accuracy](#), [storage limitation](#) and [integrity and confidentiality](#).

b. Alignment with the GDPR

According to Article 91 GDPR, ecclesiastical data protection rules can be applied if they align with the GDPR.

The material scope of application of Article 91(1) GDPR extends to churches or religious communities or associations. From the standpoint of EU lawmakers, this broad subjective scope is understandable. The EU Member States possess a diverse body of state-church law, most of which has been shaped historically. In accordance with the requirements of Article 17 TFEU, this diversity must be preserved in its entirety. In order to achieve the far-reaching guarantee protection in Article 17 TFEU and Article 91 GDPR, the scope of application must be interpreted as broadly as possible to religious associations. The case law of the German Federal Constitutional Court can be used as a guide; according thereto, the “side activities” of a religious association are also covered by freedom of religion (German Federal Constitutional Court, *NJW* 2002, 663).

The text of the GDPR refers to the continued existence of data protection regulations that were already in force on 24 May 2018. However, the requirement of being “brought into line” implies further development of the existing legal status. One such development can be seen in the publication of updated versions of “Global Policy on Use of Personal Data”, “Global Data Protection Policy of Jehovah’s Witnesses”, “Global Policy on Use of Cookies and Similar Technologies” as well as “Use of Personal Data—Germany” (available at <https://www.jw.org/en/privacy-policy/>).

In addition, with the new version of the DSGJZ, an Act was developed that stipulates and upholds personal data protection. The current version takes care to ensure compliance, at the very least, with the level of protection afforded by the GDPR. The following boxes clearly show the overlaps between the GDPR and the DSGJZ and the harmonisation achieved.

As is already clear from the foregoing that the DSGJZ focuses on the same rights and remedies as the GDPR.

Seven Principles	Reasons for Processing	Individual Rights
<ul style="list-style-type: none"> • Lawfulness, principle of fairness, comprehensibility [Art. 5 GDPR, § 3(1) DSGJZ] • Purpose limitation [Art. 5(1)(b) GDPR, § 3(1) DSGJZ] • Data minimisation [Art. 5(1)(c) GDPR, § 3(1) DSGJZ] • Integrity and confidentiality [Arts. 32, 5(1)(f) GDPR, § 3(1) DSGJZ] • Storage limitation [Art. 5(1)(e) GDPR, § 3(1) DSGJZ] • Accuracy [Art. 5(1)(d) GDPR, § 3(1) DSGJZ] • Accountability [Art. 5(2) GDPR, § 3(2) DSGJZ] 	<ul style="list-style-type: none"> • Consent [Art. 6(1)(a) GDPR, § 4(1)(2) DSGJZ] • Contract [Art. 6(1)(b) GDPR, § 4(1)(3) DSGJZ] • Legal obligation [Art. 6(1)(c) GDPR, § 4(1)(4) DSGJZ] • Vital interests [Art. 6(1)(d) GDPR, § 4(1)(5) DSGJZ] • Tasks in the public interest [Art. 6(1)(e) GDPR, § 4(1)(6) DSGJZ] • Legitimate interests of data controllers [Art. 6(1)(f) GDPR, § 4(1)(7) DSGJZ] • Other reasons for processing [Art. 4(1)(1) DSGJZ] 	<ul style="list-style-type: none"> • Information [Art. 12 GDPR, § 8 DSGJZ] • Obligation to notify data subject [Art. 19 GDPR, § 13 DSGJZ] • Right to access [Art. 15 GDPR, § 9 DSGJZ] • Right to rectification [Art. 16 GDPR, § 10 DSGJZ] • Right to erasure [Art. 17 GDPR, § 11 DSGJZ] • Right to restriction of processing [Art. 18 GDPR, § 12 DSGJZ] • Right to data portability [Art. 20 GDPR, § 14 DSGJZ] • Right to object [Art. 21 GDPR, § 15 DSGJZ]

In order to avoid regulatory gaps, the DSGJZ places particular value on maintaining the level of protection of the GDPR and implementing its basic concepts. Hence, § 1(6) DSGJZ establishes that the DSGJZ must be interpreted in a way that maintains the level of protection in the GDPR. As a result, § 1(7) DSGJZ establishes that, where necessary, the GDPR regulations and the data protection laws of the state – in this case, the German Federal Data Protection Act in particular – will be applied *mutatis mutandis* as part of the GDPR.

The religious association has aimed for and achieved harmonisation with the GDPR. However, there remains an open legal issue, which will preoccupy *Data Protection Supervisory Authority of Jehovah's Witnesses* in the future, as to where the lack of impairment of the internal church regulations mentioned in Recital 165 should now lie if mandatory full harmonisation were established. Ultimately, if the existing ecclesiastical regulations can only continue to apply when the full level of protection is achieved, there would be no need for the provision in Article 91(1) GDPR in the first place. For religious associations, this would result in a purely formal special role with no practical effect. One possible explanation is to interpret Article 91(1) GDPR as a kind of directive regulation. Similar to directive provisions with mandatory requirements for Member States, religious associations would be required to adopt the substantive requirements into their law in a binding manner. However, they could preserve their legislative autonomy by implementing the

requirements through their own legal structures. Moreover, in the event of a legal conflict between the regulations, the EU law would not automatically have primacy of application. In order to resolve legal conflicts, the religious association would instead be required to adapt its regulations without having to accept an immediate legal intervention. At least formally, familiar internal church law can be applied.

According to the prevailing opinion, churches in Germany did not come under the scope of the German Federal Data Protection Act. According to Article 91(2) GDPR, churches and religious communities that continue to apply the regulations in Article 91(1) GDPR are subject to independent supervision. This [supervision] can be “specific”.

According to this rule, the *Data Protection Supervisory Authority of Jehovah’s Witnesses* was established on 24 May 2018 and appointed as the supervisory authority for the processing operations of the religious association in accordance with the DSGJZ.

The jurisdiction of the *Data Protection Supervisory Authority of Jehovah’s Witnesses* is established in § 24(1) DSGJZ. According thereto, it monitors compliance with the DSGJZ and other regulations relating to data protection. According to § 24(2) DSGJZ, the *Data Protection Supervisory Authority of Jehovah’s Witnesses* exercises this activity over all structural divisions and agencies of the religious association (§ 5(1)(2) StRG).

The main objective of the work of the *Data Protection Supervisory Authority of Jehovah’s Witnesses* is to ensure compliance with the DSGJZ in comparability with the GDPR and to ensure that the activities of the aforementioned structural divisions and agencies are compatible with the standards of data protection law.

In addition, the jurisdiction of the *Data Protection Supervisory Authority of Jehovah’s Witnesses* also applies to foreign branches of the religious association, to the extent that these are responsible for data processing in Germany. This is the case, for example, for *Jehovas Zeugen in Österreich* (JZÖ). Lastly, third parties outside of the religious association also come under the supervision of the data protection supervisory authority, to the extent that these work with the religious association.

2

Data Protection under Ecclesiastical Law

2. Data Protection under Ecclesiastical Law

a. Development of data protection in the ecclesiastical law of Jehovahs Zeugen in Deutschland

The Holy Bible, to which Jehovah's Witnesses are committed, repeatedly makes clear that certain matters are confidential and that this confidentiality must be protected. Proverbs chapter 11, verse 13 states: "A slanderer goes about revealing confidential talk, but the trustworthy person keeps a confidence." In Proverbs chapter 25, verse 9, it says: "Plead your case with your neighbour, but do not reveal what you were told confidentially".

This makes it clear that Christian principle to love one's neighbour involves treating certain information as confidential and therefore to store or protect it in a special way.

This principle also aligns with the constitutionally protected personality rights of each individual, which also guarantees that certain information will be treated as confidential. Hence, the data protection required by the constitution must also be ensured within the religion association.

The religious association of Jehovah's Witnesses has always considered itself duty-bound to protect the personal data of its members and to collect only data that are necessary for the processes within the religious association. This protection and the requirement to minimise data also applies to third parties who are not members of the religious association but nevertheless have contact with Jehovah's Witnesses.

The religious association's own history also makes it clear how important it is to treat personal data with care. In Germany, Jehovah's Witnesses experienced two major waves of persecution. In the Nazi era and the former East Germany, Jehovah's Witnesses were targets of attacks, persecution and imprisonment. In the Third Reich, this even led to their being killed. These experiences demonstrate that how personal data is handled can sometimes mean the difference between life and death.

b. Current developments

i) Significant court decisions

For years, there has been a potential for tension between the requirements of European law and of German state-church law (Isensee, *Festschrift für Listl*, 1999, 67,73).

Currently, questions about data protection are also mixed into this area of tension. A decision of the CJEU (C-25/17) – which deliberately had to rule only on the Data Protection Directive 95/46/EC and not on the GDPR – addressed the degree to which the personal notes taken by Jehovah's Witnesses in their public preaching activity fall within the scope of the Directive. The Court pointed out that this can be the case under certain conditions.

Also in that decision, the CJEU stated that the religious association can be deemed co-responsible for the data processing, even if it has no access to the notes made – which the Court also stated in decision C-210/16.

The decision failed to address the issue of whether the past practice of note-taking was lawful, even under the premises used by the Court. In the opinion of the *Data Protection Supervisory Authority of Jehovah's Witnesses*, this must be assumed. The taking of notes primarily served to safeguard the negative religious freedom of the persons being visited.

Also, according to the ecclesiastical law of Jehovah's Witnesses, the public preaching activity carried out by Jehovah's Witnesses is the purely private religious exercise of individual adherents.² In Germany, therefore, there is no such attribution under data protection law as in Finland.

Meanwhile, the spiritual leadership of Jehovah's Witnesses issued a directive in May 2019 regarding the preaching activity, according to which individual adherents should completely refrain from taking notes in their private religious practice.

ii) Cooperating with state supervisory authorities

The *Data Protection Supervisory Authority of Jehovah's Witnesses* also endeavours to promote cooperation and interaction with state supervisory authorities. This cooperation, which is standardised in Article 57(1)(g) GDPR for state supervisory authorities, seeks primarily to ensure that,

²**§ 1 Act on Serving in the Religious Association in an Honorary Capacity (RLEMJZ)**

(1) Actions attributable to the Religious Association are assessed according to the religious law of the Religious Association and its self-concept.

(2) The Religious Association is not responsible for the autonomous, personal religious practice of members of the Religious Association, even when the objective of their actions coincides with that of the Religious Association.

(3) One particular activity that is autonomous and not attributable to the Religious Association is the preaching activity carried out by members (§ 13(1), sentence 4 StRG) as a personal practice of religion, even though the Religious Association makes available the infrastructure, equipment and other aids.

on the one hand, the high level of data protection is maintained and, on the other hand, no isolated solutions are created that could result in data subjects being treated unequally.

This cooperation already began during the reporting period. In one case, a data subject submitted a complaint to a state supervisory authority. Once it became apparent that the complaint related to the religious association, the state supervisory authority informed the *Data Protection Supervisory Authority of Jehovah's Witnesses*. The complaint could thus be handled by the *Data Protection Supervisory Authority of Jehovah's Witnesses* within its own jurisdiction. Once the investigation was complete, the outcome was communicated to both the data subject and the state supervisory authority. The state supervisory authority was thus informed of the outcome in accordance with ecclesiastical law. The decision of the *Data Protection Supervisory Authority of Jehovah's Witnesses* was respected.

3

Facts and Figures

3. Data protection operations during the reporting period

a. Statistics

In a working group, the data protection supervisory authorities of the state put forward proposals to standardise activity reports. The *Data Protection Supervisory Authority of Jehovah's Witnesses* did not participate therein, nevertheless, this report builds on the good results of this working group as it evaluates operations over the past year. This has also been done to facilitate comparisons between reports.

The working group proposed that the statistical section should be entitled "Facts and Figures". Subsections, such as "Complaints", "Data Protection Breaches", etc., should also be consistently used and listed. The *Data Protection Supervisory Authority of Jehovah's Witnesses* also follows these proposals of the working group.

Complaints:

For this section, the working group proposed the following:

"This section provides an overview of the number of complaints received during the reporting period. Instances received in writing, in which a natural person states that he is personally affected, are counted as complaints."

In the following, a distinction is made between submissions from complainants whose own rights may have been violated by the facts presented (= **complaint**) and those for whom this is not the case (= **review request**). This distinction is of vital importance in view of § 27(1) sentence 2 DSGJZ. Only in cases of complaint does the three-month deadline laid down in § 27 DSGJZ apply for the *Data Protection Supervisory Authority of Jehovah's Witnesses*. When a review is solely requested, on the other hand, the Supervisory Authority is under no obligation to respond within a specified period of time. The requesting party is merely informed that his message was received.

The complaints (meaning possible breaches of the data subjects' own rights) that were filed were processed by the *Data Protection Supervisory Authority of Jehovah's Witnesses*. The *Data Protection Supervisory Authority of Jehovah's Witnesses* usually receives complaints by post or email. Due to the sensitivity of data protection matters, the *Data Protection Supervisory Authority of Jehovah's Witnesses* must insist on obtaining proof of identification from a data subject before processing any concerns. This should ensure that no personal data is passed on to unauthorised third parties. Even if this procedure prolongs the processing of a data subject's requests, the *Data Protection Supervisory Authority of Jehovah's Witnesses* considers it indispensable to ensure that only authorised persons have access to data at any given time.

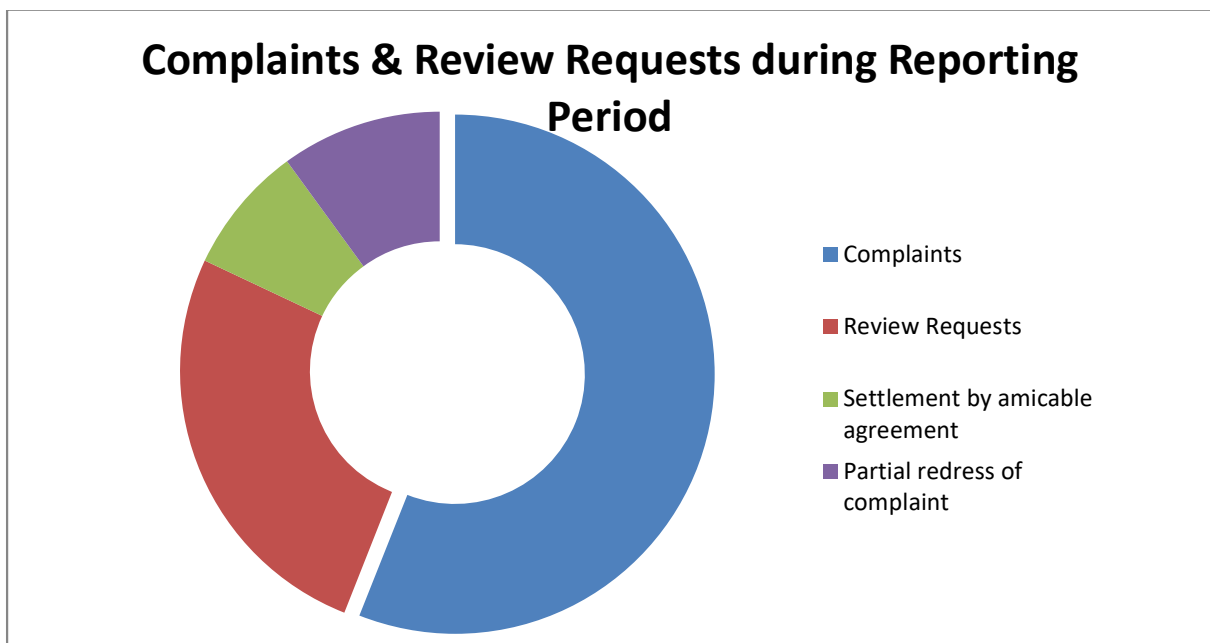
All complaints and notifications submitted to the data protection supervisory authority were able to be processed within the reporting period. More than half of the complaints were resolved, but the outcomes were unsuccessful.

In four cases, complaints were settled by agreement. In another five cases, the work of the *Data Protection Supervisory Authority of Jehovah's Witnesses* resulted in the partial remedy of complaints (partial erasure or rectification by the data controller).

In summary, all proceedings before the *Data Protection Supervisory Authority of Jehovah's Witnesses* were concluded by notifications or by amicable settlement. No legal action was taken under data protection law during the reporting period.

In all cases of notifications, no legal violations were found. Although the three-month processing obligation does not apply to “notifications”, the *Data Protection Supervisory Authority of Jehovah's Witnesses* aimed to process each notification within one month of receipt.

This results in the following graph for the reporting period.



Consultations/Advice:

For this section (with slight adjustments), the aforementioned working group made the following suggestion:

“Here is an overview of the number of consultations. This summarily includes consultations with data controllers, data subjects, and the religious association.”

According to § 24(3) DSGJZ, the core responsibilities of the *Data Protection Supervisory Authority of Jehovah’s Witnesses* include providing advice and promoting awareness of data protection issues. For this reason, written and (remote) verbal consultations are held on a regular basis to prevent data protection breaches.

This instrument can be used in advance to prevent data protection from being insufficiently implemented during processing operations. For this reason, there were a large number of consultations during the reporting period. Amongst other things, the data controller was advised on the application of the DSGJZ. Furthermore, the *Data Protection Supervisory Authority of Jehovah’s Witnesses* also acted when contracts to process orders were drawn up between the agencies of the religious association. In this way, it was possible to ensure from the very beginning that the standards of the DSGJZ, and thus also those of the GDPR, were taken into account.

Finally, adjustments to data security were achieved by means of consultations. This also included procedures under ecclesiastical law. In the processing of video recordings in particular, the religious association was advised on how to minimise data.

Data Breaches:

For this section, the aforementioned working group made the following suggestion:

“Here is an overview of the number of written reports on data breaches received from the data controller.”

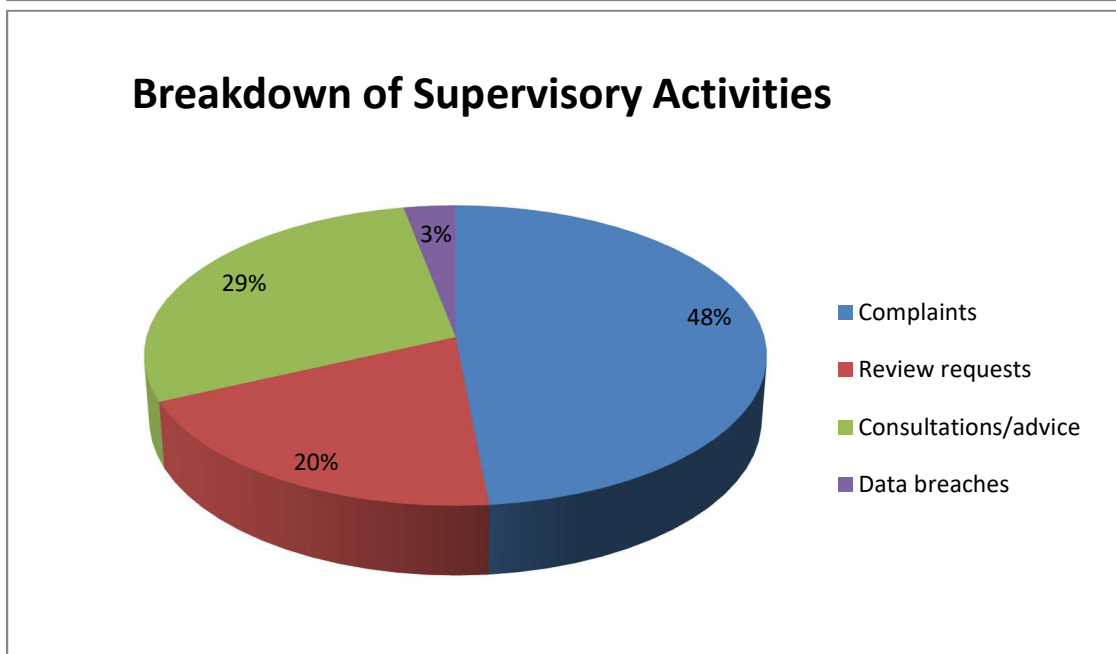
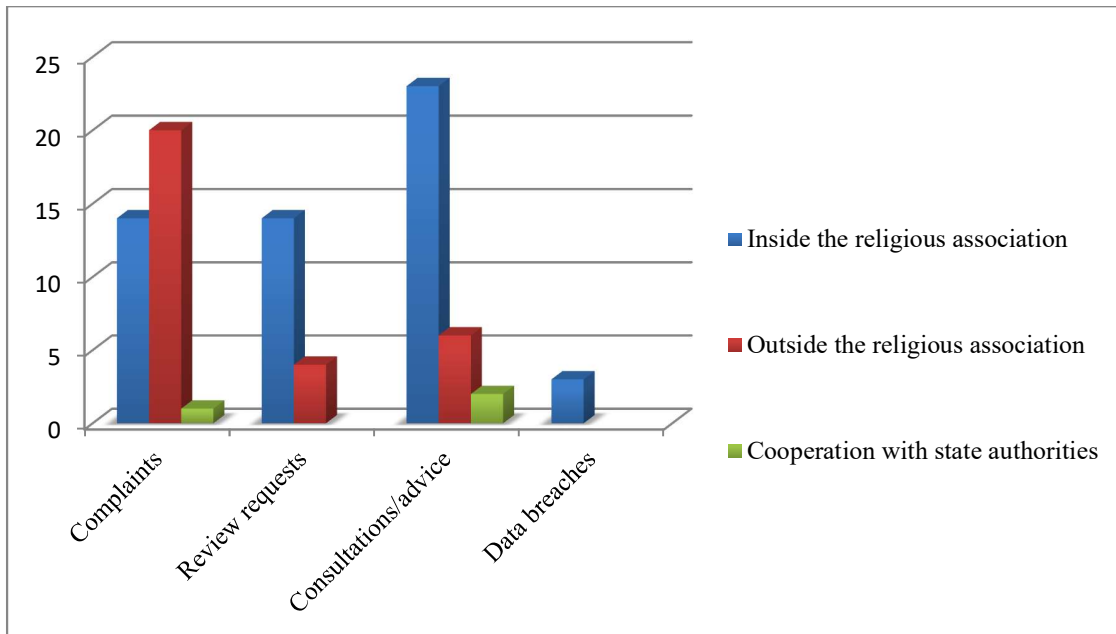
This involves recording the “data breaches” that data controllers report to the *Data Protection Supervisory Authority of Jehovah’s Witnesses*.

Data breaches have already been minimised through numerous security measures, even before the introduction of the DSGJZ in its current version.

In one of the reported cases of a data breach, a report of data theft was immediately filed. Both the *Data Protection Supervisory Authority of Jehovah’s Witnesses* and those affected were informed of the data breach.

The *Data Protection Supervisory Authority of Jehovah's Witnesses* notes that the religious association manages data breaches with the necessary seriousness and takes measures to prevent the recurrence of such data breaches.

Given the above categories, a graphical analysis of the activities of the *Data Protection Supervisory Authority of Jehovah's Witnesses* during the reporting period looks as follows:



b. Inspections

As part of the inspection conducted by the *Data Protection Supervisory Authority of Jehovah's Witnesses*, the authority turned its attention to various issues over the past year and reviewed them for their conformity with the DSGJZ.

Among other things, the video surveillance of Kingdom Halls (church buildings of Jehovah's Witnesses) created an opportunity to provide the religious association with advice and support. For example, a sign was created in consultation with the religious association's data protection officer that complies with the legal requirements for all Kingdom Halls where video surveillance takes place.

During the inspection, emphasis was placed on working with the together with the data protection officer to achieve the goal of protecting property and preventing criminal prosecution, while at the same time taking account of the freedom rights of the data subjects. Attention will have to be paid to:

- where cameras are installed,
- which areas can be filmed,
- how long recordings can be stored (if at all) and where footage can be stored,
- the technical function that cameras have and the extent to which these can be used.

The responsible members of the religious association were also notified of this list of criteria.

In the course of the inspections, the data controller was also made aware of the importance of carrying out a Data Protection Impact Assessment (DPIA) prior to introducing any new data processing. This means that the particular risks to the rights and freedoms of the data subjects inherent in the process must be examined and a statement must be issued at the end of this inspection regarding the lawfulness of the data processing.

GLOSSARY

Accuracy	Personal data must be factually accurate and kept up to date. Inaccurate data must be erased or rectified.
Data minimisation	Above all, this principle states that data collection and processing must be limited to the minimum necessary for the purposes of the data processing.
DSGJZ	Data Protection Act of Jehovah's Witnesses – the Data Protection Act of Jehovah's Witnesses is also a component of ecclesiastical law. This Act regulates the processing of personal data by the religious association of Jehovah's Witnesses.
Ecclesiastical Law	The law drawn up by the religious association (itself) in order to organise and manage its own affairs (for example, the statutes of the religious association).
Fairness/transparency	Personal data processed lawfully, in accordance with the principle of fairness and in a transparent manner in relation to the data subject. In particular, these principles are specified in concrete terms by the DSGJZ obligations to provide information and notification.
GDPR	The General Data Protection Regulation (Regulation of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC) of 2016 unifies the rules for the processing of personal data by companies, public authorities and associations within the European Union. The handling of data is clarified in eleven chapters with a total of 99 Articles.
Integrity and confidentiality	When processing personal data, appropriate security mechanisms must be in place to prevent unauthorised and unlawful processing of personal data as well as loss or damage.
Personal data	Personal data are individual details about personal or factual circumstances of a specific or identifiable natural person (data subject).
Purpose limitation	Personal data may only be collected for specified, explicit and lawful purposes.

Storage limitation

This principle complements purpose limitation. The data may be stored as long as is necessary to achieve the purpose pursued by the data processing.