

Supplementary submission to Petition No. 2633/2025

Subject: Systemic GDPR violations in vehicle registration practices within the European Union and associated security, economic and societal risks

I hereby submit this supplementary statement in connection with my registered petition no. 2633/2025, currently under consideration by the Committee on Petitions of the European Parliament.

I submit this addition in my capacity as a jurist specialised in European Union law and the General Data Protection Regulation (GDPR), acting independently as a European Citizen Advocate. I am of Dutch nationality and submit this matter as an EU citizen, not on behalf of any institution or authority.

Background and scope of the issue

In several Member States, including Germany, current vehicle registration practices continue to expose personal data of former vehicle owners to private third parties upon transfer of ownership. This includes, inter alia, names, previous addresses and identifiable ownership histories.

This practice has long been treated as an administrative routine. However, based on extensive analysis, professional legal assessment and numerous indications from affected citizens and market participants, there are compelling reasons to reassess this practice at Union level from a data protection, security, economic and fundamental rights perspective.

This submission does not concern isolated incidents. It concerns a **systemic administrative practice** with cross border implications within the internal market.

Economic discrimination and market distortion

Numerous reports from the automotive trade indicate tangible economic damage resulting directly from the disclosure of previous owner data. Vehicles are demonstrably devalued or rejected by potential buyers solely due to the visibility of foreign or otherwise identifiable former owners.

This constitutes a form of factual discrimination that affects market value, trust and legal certainty. Importantly, these effects are not caused by technical characteristics of vehicles, but exclusively by unnecessary disclosure of personal data.

GDPR violations

From a legal standpoint, the current practice constitutes a violation of multiple core provisions of the GDPR, in particular:

Article 5(1)(c) data minimisation

Article 5(1)(f) integrity and confidentiality

Article 6(1) lack of a valid legal basis
Article 25 data protection by design and by default

The disclosure of full ownership histories to private parties goes far beyond what is necessary for vehicle registration or proof of ownership. No compelling legal necessity for such disclosure can be identified.

Security implications and unresolved criminal risks

Beyond data protection and economic harm, there exists a serious security dimension.

To illustrate this, a particularly sensitive but realistic scenario is presented:

If a vehicle was previously owned by a publicly exposed or otherwise identifiable individual, a subsequent buyer may, through minimal documentation, reconstruct private residential addresses or familial connections. This may lead to harassment of family members and, in the worst case, to more severe consequences. Such a risk is not acceptable in a constitutional state governed by the rule of law.

Beyond the data protection and economic aspects, there exists from a security analytical perspective a serious possibility that the disclosure of former vehicle holder data has unintentionally facilitated risk chains, including potential influence on unresolved criminal cases. This is not asserted as an allegation, but identified as a plausible and insufficiently examined risk.

This particularly concerns unresolved cases involving:

Homicide offences including murder and manslaughter
Missing persons cases, especially where third party involvement is suspected
Serious violent crimes with unidentified perpetrators
Sexual offences, particularly where serial patterns exist or the offender remains unknown
Extortion and kidnapping cases lacking investigative leads
Organised crime and serious economic crime, including systematic fraud or protection rackets
Serial or connected offences where individual acts may form part of broader patterns

These constellations demonstrate that data protection is not merely an administrative or economic obligation. It also functions as a security safeguard. When personal data is disclosed without compelling necessity, risk chains may arise whose consequences only become visible years later.

Data protection does not only protect data. It can protect people and may allow unresolved questions to be reassessed.

European relevance and request

Given the cross border nature of vehicle markets and data flows, this issue requires a coordinated European assessment. I therefore request that this supplementary submission be formally attached to petition no. 2633/2025 and taken into account in its examination.

This matter concerns fundamental rights, legal certainty and public trust in administrative systems. Administrative habit cannot justify systemic exposure of personal data.

I act independently, neutrally and exclusively in the interest of European citizens.

Respectfully submitted,

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