

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

Fields marked with \* are mandatory.

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## Objectives and General information

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You are invited to read the privacy statement<sup>[1]</sup> 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.

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 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.

[1] Add link.

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

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**\* 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**

**\* 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 a rightholder or a rightholders' association?

- Rightholder
- Rightholders' association

\* You are what type of rightholders' association?

- Umbrella/cross-sector association
- Sector association
- SME
- National
- European
- International

\* Please indicate your country of residence, establishment or profession:

- |   |                                   |                                      |
|---|-----------------------------------|--------------------------------------|
| <input type="radio"/> Austria                   | <input type="radio"/> Belgium     | <input type="radio"/> Bulgaria       |
| <input type="radio"/> Cyprus                    | <input type="radio"/> Croatia     | <input type="radio"/> Czech Republic |
| <input type="radio"/> Denmark                   | <input type="radio"/> Estonia     | <input type="radio"/> Finland        |
| <input type="radio"/> France                    | <input type="radio"/> Germany     | <input type="radio"/> Greece         |
| <input type="radio"/> Hungary                   | <input type="radio"/> Ireland     | <input type="radio"/> Italy          |
| <input type="radio"/> Latvia                    | <input type="radio"/> Lithuania   | <input type="radio"/> Luxembourg     |
| <input type="radio"/> Malta                     | <input type="radio"/> Netherlands | <input type="radio"/> Poland         |
| <input type="radio"/> Portugal                  | <input type="radio"/> Romania     | <input type="radio"/> Slovakia       |
| <input type="radio"/> Slovenia                  | <input type="radio"/> Spain       | <input type="radio"/> Sweden         |
| <input checked="" type="radio"/> United Kingdom | <input type="radio"/> Other       |                                      |

\* What is the core sector of your activity(ies)?

- A Agriculture, forestry and fishing
- B Mining and quarrying
- C Manufacturing
- D Electricity, gas, steam and air conditioning supply
- E Water supply; sewerage, waste management and remediation activities
- F Construction
- G Wholesale and retail trade; repair of motor vehicles and motorcycles
- H Transportation and storage
- I Accommodation and food service activities
- J Information and communication
- K Financial and insurance activities
- L Real estate activities
- M Professional, scientific and technical activities
- N Administrative and support service activities
- O Public administration and defence; compulsory social security
- P Education
- Q Human health and social work activities
- R Arts, entertainment and recreation
- S Other service activities
- T Activities of households as employers; undifferentiated goods- and services-producing activities of households for own use
- U Activities of extraterritorial organisations and bodies
- Other

If possible please specify with four-digit [NA](#) [CE](#) classification:

90.03

In which Member State(s) do you trade?

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

\* **What type of IPR do you hold/represent?**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Copyright  | <input type="checkbox"/> Community trademark rights  |
| <input type="checkbox"/> Community design rights   | <input type="checkbox"/> Rights related to copyright   |
| <input type="checkbox"/> National trademark rights   | <input type="checkbox"/> National design rights  |
| <input type="checkbox"/> Patent rights (including rights derived from supplementary protection certificates) | <input type="checkbox"/> Geographical indications  |
| <input type="checkbox"/> Rights of the creator of the topographies of a semiconductor product                | <input type="checkbox"/> Plant variety rights  |
| <input type="checkbox"/> Sui generis right of a database maker   | <input type="checkbox"/> Trade names (in so far as these are protected as exclusive property rights in the national law concerned) |
| <input type="checkbox"/> Utility model rights  | <input type="checkbox"/> Other   |
| <input type="checkbox"/> Don't know  |  |

## B. Exposure to and impact of infringements

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**Do you experience occurrence of IPR infringements when offering your services or trading your goods?**

- Yes  
 No

Please provide detail:

*1500 character(s) maximum*

BAPLA members have extended that network globally to bring professional photographs to the market place. They have also always embraced change and adapted more readily to digital changes as they arose. However a growing challenge to this value chain has been the inability for our member picture agencies and libraries to protect against the tsunami of millions of individual infringements that occur every second on both social media platforms and internet service providers.

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

- Loss of turnover**
- Monitoring costs (e.g. technical measures for prevention and detection)**
- Litigation costs**
- Free promotion of the brand/product**
- Reputational damage**
- Non-legal enforcement costs (e.g. notice and action procedures)**
- Other**

Please specify:

*1000 character(s) maximum*

- Double edge sword for image rights holders who have no choice but to market using leviathan platforms with hosting privileges;

- Imbalance of position for creator and representative between the need to be found (to make a living) and the encouragement to upload and share creative content;

- Transfer value - from rights holder to platform without any reciprocity - billions of £ pounds made by platforms with no obligation to remunerate creators whether professional or non-professional;

- Online platforms preside over at arms length due in part to eth E-commerce Directive, and barely take on any liability for the scale of infringement that occurs;

- Photo libraries have a business model that provides a reciprocal remuneration structure, and is a good example of what Internet platforms should engage with. However they increasingly experience challenges to the sector's value chain to the point of disincentivisation to reinvest.

**What is the overall financial impact of IPR infringements on your turnover?**

- Positive**
- Negative**

**Please provide an estimation in percentage of overall turnover.**

 %

**From your experience, how did the occurrence of IPR infringements develop over the last 10 years?**

- Decreased**
- Increased**
- Unchanged**
- Don't know**

Please provide detail:

*1500 character(s) maximum*

If we look at the economy of scale within the creative industry, and in particular the business of images, all of it occurs online via the Internet, whether transferring or marketing photos as a digital product. What cannot be underestimated is the power of online platforms, such as search engines and social media, which have seen exponential growth over the last 10 years with a significant impact on the professional market. BAPLA has conducted research over the last year that supports this. We have reached the tipping point in which the control and consent of a copyright owner is irrelevant in the face of these enormous powerhouses.

## 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

**Have you filed legal action against infringers of your IPR?**

- Yes**
- No**



**Do you think that the existing rules – as provided by the Directive and implemented at national level – have helped effectively in protecting IP and preventing IPR infringements?**

- Yes
- No
- Partly
- No opinion

Please explain:

*1500 character(s) maximum*

The main issue with the enforcement framework is that there are no concrete legal remedies for copyright-protected images as digital content and the tsunami of infringement and commercial exploitation undertaken on internet service providers and social media platforms. The consequence of which means that many of the infringements identified on commercial websites are from framed and in-lined hyperlinks and implied licenses, none of which can be resolved by IPRED nor the E-commerce and INFOSOC directives. As evidenced in a survey conducted by BAPLA in 2015: 94% of members had experienced copyright infringement online, but only 37% routinely pursue such infringements; 31% of those surveyed would not supply images for social media use, while 27% would do so on occasion

[[http://bapla.captureweb.co.uk/coo/user/gpimages/Web%20social%20media%20and%20app%20survey%20results.pdf?dm\\_i=5VL,3J1I2,QW899,CNEIS,1](http://bapla.captureweb.co.uk/coo/user/gpimages/Web%20social%20media%20and%20app%20survey%20results.pdf?dm_i=5VL,3J1I2,QW899,CNEIS,1)].

**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*

IPRED offers principled language that sings to the heart of every creative rights holder, however for visual works such as photographs, the ability to use IPRED in conjunction with the E-commerce Directive (2000) and the INFOSOC Directive (2001) is entirely defunct for the photography sector. To understand why is to look at the structure - there are thousands of professional photographers across Europe, including the UK, many of whom work with the hundreds of picture libraries and agencies (many of whom are SMEs) as there has been a healthy network of opportunities for over 40 years, to license directly to print and online publishers of all kinds, helping image rights holders fully exploit their works and claim remuneration.

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

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 Evidence (Articles 6 and 7)

**Would you consider that the measures provided by IPRED are effective means for presenting, obtaining and preserving evidence?**

- Yes
- No
- No opinion

**Did you face problems using evidence when making use of your right of information/taking legal action/applying for an injunction in a cross-border situation (judicial authority in your country of establishment and (alleged) infringer/intermediary incorporated or resident in another Member State and/or judicial authority of another EU Member State)?**

- Yes
- No

**In view of your experience with the application of the rules for having access to and preserving evidence do you see a need to adjust the application of that measure, in particular with regard to preserving evidence in the digital environment?**

- Yes
- No
- No opinion

### C.2.2. Right of information (Article 8)

**Have you made use of your right of information by applying for an order by a judicial authority?**

- Yes, against an infringer
- Yes, against an intermediary
- No

**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 consider that the right balance is struck between the right to property and the right to judicial review on the one hand and the right to respect for private life and/or the right to protection of personal data on the other?

- Yes
- No
- No opinion

### C.2.3. Procedures and courts, damages and legal costs (Articles 3, 13 and 14)

**Have you filed legal action against infringers of your IPR?**

*at most 2 choice(s)*

- Yes
- No

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

- Yes
- No

**Did you apply for damages as a compensation for the prejudice suffered as a result of IPR infringement?**

- Yes
- No

### C.2.4. Provisional and precautionary measures and injunctions (Articles 9 and 11)

**Have you applied for provisional and precautionary measures in case of an infringement of your IPR?**

- Yes, against an infringer
- Yes, against an intermediary
- No

**Have you applied for an injunction in case of an infringement of your IPR?**

- Yes, against an infringer
- Yes, against an intermediary
- No

**In view of your experience with the application of the rules for provisional and precautionary measures and injunctions do you see a need to adjust the application of these measures?**

- 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*

We would question the overall effectiveness of enforcement provisions. The responsibility (duty of care) must be undertaken by internet platforms such as ISPs and social media sites, especially in light of developing further sharing opportunities between platforms, such as Facebook > YouTube > Whatsapp, all owned by one company Facebook. The sanctions covered in Art. 8 of the INFOSOC Directive (2001), such as Notice & Takedowns are for the most part ineffective against a tsunami of small and regular infringements by a multitude of users unlawfully uploading content without permission, agreeing to in perpetuity third party use licenses they have no right to grant.

**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*

See above comments

**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*

See comments above

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

- Yes
- No
- No opinion

**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

**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

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

- Yes
- No
- No opinion

#### C.2.5. Publication of judicial decisions

**Have you requested in legal proceedings instituted for infringement of an IPR the decision to be published in full or in part?**

- Yes
- No

**Do you see a need for / added value in a more systematic dissemination of the information concerning the decision in legal proceedings instituted for infringement of an IPR?**

- Yes
- No
- No opinion

#### C.2.6. Other issues

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

- Yes
- No
- No opinion

Please specify the relevant provisions and explain.

1500 character(s) maximum

The E-commerce Directive undermines licensed service such as picture libraries and agencies that aid rights holders ability to exploit their works, by impacting on market development. Accepting that there is enormous value locked up within these new online platforms, which is not returned back to rights holders, within the structure of the E-commerce Directive.

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

### 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

**Which intermediaries are best placed to prevent infringements of IPR?**

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

**Do you cooperate with intermediaries in the protection and enforcement of your IPR?**

- Yes
- No

**Why do you not cooperate with intermediaries?**

- Not aware of the possibility
- Investigation and reporting costs
- Negative experience
- Other

**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

## D.2. Specialised courts

**Have you filed legal actions with a court, a court's chamber or a judge specialised in IP matters?**

- Yes
- No

**Does the legal action at a court specialised in IPR matters provide an added value compared to legal actions at other courts?**

- Yes
- No
- No opinion

**Please specify the added value:**

- Shorter proceedings
- Lower costs
- More expertise
- Court proceedings more fit-for-purpose
- Better quality of the court decision
- Other

## D.3. Other issues outside the scope of the current legal framework

**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
- No opinion



Please specify:

*3000 character(s) maximum*

BAPLA welcomes this survey on Enforcement and IPRED, and the opportunity to highlight the issues for copyrighted visual content such as images. We have already reached the tipping point and ask that the EU Commission help restore the online market place for rights holders so our members can continue to work with and invest in new professional creative content. We have outlined below a summary of the issues, and recommended solutions we hope the EU commission will consider.

#### Issues

- We have identified that there is actual harm to our members in the value chain in relation to images online;
- There are no concrete remedies for the wholesale exploitation of visual works online via online technology intermediary platforms such as ISPs and Social Media;
- There are major disparities for the protection of visual works - IPRED refers copyright works to E-commerce & INFOSOC, which are equally complex, exploited mercilessly online, and not fit for purpose;
- The onus is always on the rights holder to act, but when so many of our members are faced with millions of infringements occurring every second on such platforms, it is a challenge to effectively use tools such as the Notice & Takedown, with the opportunity for the same images to be uploaded again and doesn't solve the problem of preventing infringers uploading images in the first instance;
- First sale doctrine and reaching a "new public" on the internet are resulting in exhaustion of via these platforms, which is inconsistent with Art. 3 INFOSOC Directive;

#### Solutions

- The EU Commission clarifies and redresses the legal framework, which recognises active commercial online platforms and the challenges outlined above, to harmonise enforcement policies laid out in the three outdated directives (IPRED, E-commerce & INFOSOC);
- Consider forward looking legislation rather than retrospective and introducing a "Safe Harbour Light" solution, rewarding those platforms that 'do the right thing', which includes entering licensing transactions with identified image rights holders by shielding them from liability;
- Together with providing an EU-wide simplified IPEC Small Claims track, following the success of the UK system;
- Aim to encourage collaboration between professional right holders such as image makers and online platforms;
- Incentivise online platforms to evolve their business models, which respects rights holders and remunerates them fairly, rather than ignore or remove rights holders images completely;
- Inconceivable that online platforms would direct liability onto individual users uploading content without permission, therefore the use of prominent warnings to users at the point of upload would be welcomed.

## E. Other comments

### Do you have any other comments?

- Yes  
 No

Please specify:

*3000 character(s) maximum*

BAPLA (the British Association of Picture Libraries and Agencies) is the UK trade association for picture libraries and agencies representing photographers and image-makers. The photo licensing industry is worth several million Euros across Europe as a whole, with BAPLA members contributing a sizeable amount towards this. Our members employ in the region of 2,500 people in the UK and generate revenue for, and manage the interests of over 120,000 creators and rights holders. The photographic sector is unique within the framework of the UK creative industry. Our members have adapted the needs of our B2B clients as well as to market changes as rapidly as they appear, continuously striving to work towards solutions for the growth in digital enterprises.

Sharing and widespread use of images is good for society, it makes the world a more enjoyable place, but if the owners of images are to share in any of the value that their images contribute, then regulation is needed to address the following issues:

- Hosting defence (Art. 14) should be updated so that it is only available to hosts acting in a purely passive manner, as originally intended;
- the right of "communication to the public" should be adjusted to reflect reality, so as to include the displaying of a copyright work by framing in a manner that is substitutive to the published work it is framing (distinct from other types of hyperlinking which are fine and to be encouraged); and
- competition law should be applied in a way that prevents monopolistic search engines from using third party content to compete against the owners of that third party content.

We would finally argue that legal measures require EU harmonisation across all member states, both as the internet itself permeates across borders and the European Court of Justice has made significant rulings in relation to copyright over the last few years, it would be most valuable at EU level.

"We realised some time ago that we could not pursue the tsunami of global misuse." Arcaid Images

[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/c0cad348-a3f7-4a4a-b786-298bf6800d7e)

[DE] Hintergrund (/eusurvey/files/16f05f81-262b-41ed-8e9a-bc45134d58f1)

[EN] Background information (/eusurvey/files/2cf20216-9fed-49fb-94a9-9adde6ae4fe5)

[EN] Privacy statement (/eusurvey/files/154750d0-6ce2-4884-afa5-4ecb65373ab3)

[ES] Antecedentes (/eusurvey/files/52299ec1-7d19-4980-a20d-065782b74c21)

[ES] Declaración de confidencialidad (/eusurvey/files/12984633-bbad-415d-b38f-5df82493d099)

[FR] Contexte (/eusurvey/files/7e7a0e47-d9be-490d-8b1b-525669e7a5e8)

[FR] Déclaration relative la protection de la vie privée (/eusurvey/files/1be50e4b-4cb8-458b-b95e-2d7f1cf2d419)

[IT] Contesto (/eusurvey/files/d559d41e-c037-4811-9abb-9aa8f3c666f6)

[IT] Informativa sulla privacy (/eusurvey/files/e49823dc-1131-41e1-9eec-a2ef1a0945bc)

[PL] Kontekst (/eusurvey/files/12646955-2b9b-46ed-93aa-cf24e179d552)

[PL] Oświadczenie o ochronie prywatności (/eusurvey/files/e6b2bff6-5c2a-430f-8c33-12d61290f76b)

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## **Contact**

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