May I automatically add registered users to the newsletter?

For: Paušalni obrt · Obrtnici · j.d.o.o. · d.o.o.

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Applicability: When choosing the legal basis and drafting the application

Opening a user account and marketing emails serve different purposes. Do not treat registration as automatic consent for a newsletter.

What does that mean in practice?

For each purpose of processing, establish the appropriate legal basis in advance. The AZOP emphasises that a privacy policy alone does not constitute consent.

A practical approach is to provide a separate, unlabelled newsletter option and to keep a record of confirmations. Do not use service account notifications for covert advertising.

An example from everyday business

The user opens a free account to save their responses. Their email address is recorded in the account record, not on the newsletter list, without a separate subscription.

Specific next steps

1. Separate the data required for the invoice from the marketing selection.
2. Provide a clear and voluntary separate declaration.
3. Keep proof of a valid choice and enable cancellation.

Most common mistakes

• Condition a free account on marketing consent.

• To regard acceptance of privacy as sufficient marketing consent.

Limits of application

General principle of purpose separation. Special statutory exceptions for direct marketing require a separate assessment.

Sources

AZOP · legal grounds for processing

https://azop.hr/pravni-temelji-za-obradu-osobnih-podataka-clanak6-gdpr/

AZOP · Information and Privacy Policy

https://azop.hr/informiranje-ispitanika-o-obradi-njegovih-osobnih-podataka-politika-privatnosti/

Original page

https://adriatrends.hr/poslovni-vodic/en/pitanja/korisnicki-racun-nije-newsletter