

Path: Home page > Main menu > Supervisory and decision-making activity Control of personal data processing in connection with sending satisfaction questionnaires (the company Heureka Shopping s.r.o.)

On the basis of five initiatives, the Office carried out an inspection of the processing of personal data in connection with the sending of satisfaction questionnaires. The Office focused in particular on compliance with obligations when informing customers and when transferring customers' personal data.

In connection with the provision of the "Customer Verified" service, the controlled person is in the position of a personal data processor, and individual online stores are in the position of personal data administrators. For the purpose of generating questionnaires, personal data (e-mail addresses) are transferred to the controlled person based on the consent of the data subject in the sense of § 5 paragraph 2 of Act No. 101/2000 Coll. (legal title for processing), which customers grant through the terms and conditions when purchasing goods or services in individual online stores.

The Office evaluated the contracts between the controlled person in the position of processor and the individual administrators as corresponding to the legal requirements, in particular § 6 of Act No. 101/2000 Coll. (processing contract). This conclusion is not contradicted by the finding that the processor's guarantees about the technical and organizational security of personal data protection are detailed in the terms and conditions of the "Verified by customers" program and not directly in the contract, as the terms and conditions are in this case an integral part of the contractual relationship.

The Office also checked the fulfillment of the obligations stipulated in § 8 (obligation of the processor to notify the administrator of a breach of duty and to terminate the processing), § 13 (security of personal data) and § 20 (disposal of data) of Act No. 101/2000 Coll. In connection with the subject processing of personal data, the Office did not detect a violation of Act No. 101/2000 Coll.

The inspection was conducted by the inspector: Ing. Josef Vacula.

ContextLocation: Document folders > Site map > Main menu > Supervisory and decision-making activities > Completed inspections > Inspections for the year 2018 > Inspection activities according to the Personal Data Protection Act - 1st semester > Inspection of personal data processing in connection with sending satisfaction questionnaires (Heureka company Shopping s.r.o.)View current documents | document archive | documents including the archive