

In 2022, the Office completed an inspection, the subject of which was compliance with the obligations of the Ministry of Health in the processing of personal data of the data subject in connection with the EU COVID-19 electronic certificate, made available on the vaccination portal <https://ocko.uzis.cz/>, including the "Dot" applications and "chDot".

As part of this inspection, the Office mainly focused on the obligations under Article 32 of the GDPR, i.e. the obligations regarding the security of personal data processing.

The Office found in the control protocol that the controlled person "does not fulfill the obligations according to Article 32 of Regulation (EU) 2016/679, because:

in connection with the issuance of the original certificates, when the QR code was read by a reader in a mobile device, data on the certificate holder's insured number was made available;

in the čTečka application, it was not impossible to take a screenshot of the display, which contradicts the purpose of the application, i.e. verifying the validity of certificates, without leaving an electronic trail with personal data about this verification."

The President of the Office rejected the submitted objections. The detected violation was subsequently corrected by the inspected person, so there was no reason to initiate administrative proceedings to impose a corrective measure.

The Authority is aware of the sensitivity of vaccination data and therefore conducted an in-depth security review of the processing of personal data within the applications that worked with this data and demanded the maximum level of security of health data.

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