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## Company

The authority received a total of six complaints against the company in question, which objected to the processing of personal data aggregated on the company's website, in the form of simply transferring them from publicly accessible registers (e.g. ARES, commercial register, trade register, etc.) The subject of the inspection was compliance with the obligations set by the general regulation and Act No. 110/2019 Coll., on the processing of personal data, in connection with the processing of personal data on the Internet, respecting the right to erasure as well as the right to information about the processing of personal data, both in the scope of complaints filed and in the extent of the general fulfillment of the rights of data subjects in the processing of their personal data in the Internet environment. In the report on the inspection, the Office noted a violation of:

(i) Article 6 point 1 of the general regulation, because in the case of a simple overturning of the trade register and the commercial register by the inspected company, such processing is illegal, since the mere "overturning" of the public register did not meet the condition of necessity in relation to the purpose processing of personal data declared by the company, and therefore the legal title referred to in Article 6 paragraph 1 letter f) of the general regulation could not be applied for the given processing, (ii) Article 5 paragraph 1 letter a) of the general regulation, as the company processed personal data without possessing any of the legal titles listed in Article 6 point 1 of the general regulation, (iii) Article 12 point 3 of the general regulation, as some of the complainants were not informed in any way about the method of processing their request for deletion of personal data [i.e. the company did not provide the data subjects with information about the measures taken according to Articles 15 to 22 of the General Regulation], (iv) Article 12 point 2 of the General Regulation, because the company did not facilitate the exercise of the rights of the complainants (data subjects) according to Articles 15 to 22 of the General Regulation and (v) Article 14 of the General Regulation, because the controlled company has not fulfilled its information obligation according to this article [by simply publishing information according to Article 14 of the General Regulation on the company's website, this obligation cannot be considered fulfilled]. No objections were filed against the inspection protocol. In conclusion, it should be noted that the inspection was followed by an administrative proceeding in which an order was issued to impose corrective measures and impose a fine of CZK 500,000, and that during the inspection the company was fined for non-cooperation in the amount of CZK 100,000 [for violation Article 15 paragraph 1 letter a) of the

control order].

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