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On the basis of a complaint filed with the British Supervisory Authority, the Office carried out an inspection, the subject of which was the processing of personal data of a former employee of the inspected person, with a focus on observing the rights of the data subject when processing a request for access to personal data pursuant to Article 15 of Regulation (EU) 2016/679 .

The complainant stated that he contacted the controlled person (his former employer) with a request for access to personal data. According to the complainant, this request was only partially granted, as he did not receive the information to the required extent, even on the basis of a repeated request. The inspectors checked the processing of this request and came to the conclusion that the complainant was not provided with information about specific recipients of personal data, or some processors of personal data were not listed among the recipients. In this respect, the inspectors therefore stated that the inspected person violated the obligation specified in Article 15 paragraph 1 letter c) Regulation (EU) 2016/679, as following the subject's request it is basically necessary to provide information about specific recipients of personal data. However, in relation to other information on the processing of personal data and copies of personal data, the inspectors concluded that the inspected person provided the complainant with all the information that he was obliged to provide. Other data that the complainant requested are no longer subject to the obligations of the controlled person arising from Article 15 of Regulation (EU) 2016/679, i.e. they were not obliged to make them available, with reference to the protection of the rights of third parties, or because the requested information is not subject to the right of access to personal data. The inspectors further evaluated whether the inspected person cooperates with the processors of personal data, or whether the concluded contracts correspond to the requirements of Article 28, paragraph 3 of Regulation (EU) 2016/679 and further, whether the controlled person has processed records of processing activities in accordance with Article 30 of this Regulation. No wrongdoing was found in this direction. The Authority therefore found that the inspected person violated Article 15 paragraph 1 letter of c) Regulation (EU) 2016/679 (provision of information about specific recipients of personal data). The Chairwoman of the Office rejected the objections that the inspected person filed against the inspection findings. Considering the fact that the inspected person is a company operating only in the Czech Republic and the processing in question is therefore not cross-border processing, the Office dealt with cases on the basis of a request for mutual assistance submitted pursuant to Art. 61 of Regulation (EU) 2016/679. The British supervisory authority was informed about the handling of this matter. The inspection was conducted by

inspector Mgr. et Mgr. Božena Čajková. Recommendation: Upon request pursuant to Article 15, paragraph 1 of Regulation (EU) 2016/679, the applicant must provide, among other things, information about specific recipients of personal data. Recipient categories can only be provided if the identity of the recipients is not (yet) known to the administrator, for example because the personal data is (or may) be transferred to them only in the future.

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