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On the basis of two complaints, the Office carried out an inspection in accordance with Regulation (EU) 2016/679, the subject of which was the processing of personal data through a camera system with recording located in an apartment building. The camera system covered the entrance door to the house, the elevator door on the ground floor and, at the same time, the entrance door to one of the apartments adjacent to the elevator. The office found that the reason for installing the camera system is to protect the property of the inspected person, or protection of life and health of persons moving in the house. After assessing all relevant circumstances, in particular the monitored purpose, the number of cameras, the recording retention period, informing the data subjects and the method of securing the captured recordings, the inspectors came to the conclusion that in the given case the interest of the data subjects (monitored persons) in protecting their personal data does not outweigh the interest controlled persons, or of third parties to protect property, health and life. The processing of personal data in question is therefore based on a legal reason according to Article 6 paragraph 1 letter f) Regulation (EU) 2016/679 (legitimate interest of the administrator and third parties). However, the above does not apply to monitoring the space including the entrance to the apartment, such processing already interferes with the private and personal life of data subjects to an excessive extent and is not even necessary for the monitored purpose. This partial processing therefore constitutes a breach of the obligation regulated in Article 5 paragraph 1 letter c) Regulation (EU) 2016/679 (data minimization principle). During the inspection, the inspected person adjusted the camera shot so that it did not include the entrance to the apartment. Due to the fact that the inspected person immediately corrected the defective condition, the Office did not impose measures to eliminate the identified deficiencies and waived the imposition of a fine. The inspection was conducted by inspector JUDr. Jiřina Rippelová. Recommendation: The office once again points to the fact that the camera system must not excessively interfere with the privacy of persons, while monitoring the entrance area to a third party's apartment or family home will usually be considered processing that does not comply with the principle of minimizing personal data and for which there is no legal title (if it is not the consent of the data subject). Additional recommendations for operating a camera system can be found on the Office's website (for example, <https://www.uoou.cz/k-nbsp-provozovani-kamerovych-systemu/d-29535/p1=1099>).

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