

Path: Home page > Main menu > Supervisory and decision-making activity Control of personal data processing in connection with the provision of the TelcoScore service (Company for information databases, a.s.)

Based on the initiative, the Office carried out an inspection pursuant to Act No. 101/2000 Coll., the subject of which was the processing of personal data in connection with the provision of the TelcoScore service. The inspection proved that the inspected person – the Company for Information Databases, a.s. – provides this service on the basis of framework agreements concluded with certain telecommunication operators. Based on these framework agreements, the controlled person then concludes contracts for the provision of the TelcoScore service with users of the service, which are banking and credit institutions. As part of the inspection, the inspectors also checked a complaint regarding the procedure of the service user (the company T-Mobile Czech Republic a.s.) in fulfilling the obligation to provide information to data subjects.

Thus, both telecommunications operators and service users are in the position of personal data administrator. The former define the calculation of the TelcoScore value and the conditions for providing this information to other interested parties, while the latter determine the purpose of processing this information (checking the creditworthiness and trustworthiness of the client). The controlled person acts as an intermediary between these two groups of administrators and is in the position of processor of personal data.

The TelcoScore service works in such a way that the user of the service asks the controlled person to provide information about the given client (or their phone number). The inspected person forwards this query to all involved telecommunications operators, then calculates the TelcoScore value and forwards it to the service user. The TelcoScore value thus represents a numerical expression of the creditworthiness and payment morale of the clients of telecommunications operators (in the range from 1 to 1000), which the operators calculate according to their own internal methodology, taking into account various aspects of the contractual relationship with the given client.

The transfer of the TelcoScore value to users of this service (banks or credit institutions) takes place based on the consent of the data subject - the client. Consent is obtained as part of the client's negotiations with the user of the TelcoScore service, while the telecommunication operators have determined the procedure for obtaining consent and the content of information on the processing of personal data. This should be given to clients before consent is granted.

The control came to the conclusion that there was no violation of Act No. 101/2000 Coll. during the processing of personal data in connection with the provision of the TelcoScore service (in the sense of the general setting of the parameters of this

processing, mutual relations of the participating entities and ensuring the security of processed personal data).

Due to the position of the inspected person, the details of the consent granted for the transfer of the TelcoScore value, i.e. the procedure of individual users of this service, were not subject to inspection. In relation to the initiative, the Office nevertheless found that the company T Mobile Czech Republic a.s. she informed the complainant incorrectly. It did not even provide him with basic information about the TelcoScore service, i.e. in particular information about its role in providing this service and the mechanism for calculating the TelcoScore value, or even its value (if it had already been calculated and passed on to the service user).

The inspection was conducted by the inspector JUDr. Jiřina Rippelová.

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 - 2nd semester > Inspection of personal data processing in connection with the provision of the TelcoScore service (Company for information database, a.s.)View current documents | document archive | documents including the archive