

The Personal Data Protection Agency imposed two new administrative fines for violating the provisions of the General Regulation on Data Protection and the Law on the Implementation of the General Regulation on Data Protection.

#### Administrative fine for failure to take appropriate technical measures

Due to non-undertaking of appropriate technical measures of security of personal data processing by the company for providing IT services from Zagreb (hereinafter: the company), as the executor of processing, there was a security breach which led to unauthorized processing of personal data of 28,085 respondents. unauthorized access to personal data by hackers. The processor did not take the necessary measures to achieve an adequate level of security in accordance with the existing and foreseeable risks and acted contrary to Article 32 (1) (b) and (d) and Article 2 of the General Data Protection Regulation.

The incident was reported to AZOP by the head of processing, the telecommunications company from Zagreb, who also informed the users of its services in writing about the potential breach of personal data.

The processor during the processing of personal data is obliged to take appropriate technical security measures in such a way as to ensure lasting confidentiality of the system, as well as the process of regular testing, evaluation and evaluation of the effectiveness of technical and organizational measures to ensure security of processing. consider the risks of unauthorized disclosure of personal data. Given that the company, according to publicly available information, provides information services to other mobile operators, banks and government institutions in the Republic of Croatia, but also companies abroad (USA, UK, Netherlands, etc.), should be a relevant entity in providing opinions, guidelines, propose solutions to processing managers on the implementation of web applications, and thus design and implement appropriate technical measures to protect the processing of personal data.

Accordingly, in accordance with its powers under Article 58 (2) and the General Data Protection Regulation, the Agency imposed an administrative fine, all in accordance with the conditions for its imposition under Article 83 of the General Regulation and Articles 44, 45 and 46 of the Law on the Implementation of the General Regulation on Data Protection.

#### Administrative fine for not marking the object under video surveillance

The Agency for Personal Data Protection ex officio, without prior notice, conducted direct supervision over the processing and enforcement of personal data protection, collection and processing of personal data made by the video surveillance system and determined that the insurance company based in Zagreb (hereinafter: the company) did not indicate that the business

facility (in which technical inspections and vehicle registration are carried out and insurance services are contracted) and the external surface of the business facility are under video surveillance. Thus, the head of processing, ie the insurance company, acted contrary to Article 27, paragraph 1 of the Act on the Implementation of the General Regulation on Data Protection.

The administrative fine for not marking the object under video surveillance was imposed in accordance with Article 51, paragraph 1, indent 1 of the Act on the Implementation of the General Regulation on Data Protection.

The Agency considers that the corrective measure in the form of an administrative fine is effective, proportionate and dissuasive and fully appropriate to the circumstances of both fines.