

## Internet search engine operator

The inspection was carried out on the basis of the inspection plan for 2020. The subject of the inspection was the fulfillment of the administrator's obligations under Articles 6 and 7, Articles 11-19 of the General Regulation, to the extent of the corresponding obligations under Article 5 of the General Regulation, including the use cookies as part of operating websites with multimedia content, including a search engine. The reviewers focused on the legal background that relates to the processing of cookie files. They were the first to focus on the area of European Union law. In relation to cookies, the directive of the European Parliament and the Council 2002/58/EC of July 12, 2002 on the processing of personal data and the protection of privacy in the electronic communications sector should be used. After analyzing the relevant legal regulations, the factual situation and legal certainty, the audited persons evaluated the processing of cookies in the light of national legislation, i.e. Act No. 127/2005 Coll., on electronic communications. The inspection carried out and from the Scope of Personal Data Protection Policy document revealed that the scope of processed data corresponds to the purpose of processing. The controlled person processes a reasonable, relevant and necessary range of personal data in relation to the individual purposes for which they are processed. The controlled person does not process personal data (unless it can be completely avoided) for longer than is necessary to achieve the purposes for which they were collected. And where possible, they are anonymized or pseudonymized. This approach is in line with the storage limitation principle, which enshrines the obligation to delete or anonymize personal data if we no longer need it to fulfill the purpose for which it was collected. As part of the ongoing inspection, the inspected party documented a list of cookies, from which it is evident that it processes individual types of cookies for the time necessary to achieve the purpose. From the documents submitted by the audited person and from the audit findings, it was clear that the processing of cookies takes place either on the basis of consent, on the basis of contract fulfillment or on the basis of legitimate interest. The inspection found that the inspected party provides information on the protection of personal data, i.e. on its processing, on its website, as well as information and policies on the use of cookies. It was clear from the audit findings that the audited person evaluated the seriousness and probability of the risks associated with the processing of personal data and, following this, took technical and organizational measures to ensure a level of security corresponding to the given risk. The audit did not reveal a violation of the obligations arising from the general regulation.

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