

## Operator of the news portal

The inspection was launched on the basis of the inspection plan for 2020. Its subject was compliance with the company's obligations when processing the personal data of data subjects in connection with the use of cookies within the framework of the operation of the news portal, in particular the inspection of the fulfillment of obligations according to Article 6, Article 7, Article 11-19 of the General Regulation and to the extent corresponding obligations according to Article 5 of the General Regulation. The controlled person uses technical, statistical and diagnostic, advertising and security cookies in the context of website operation. Collects information from server logs. These logs typically contain information about the user's web request, IP address, browser type, browser language, and the date and time of the request. They may contain one or more cookies that uniquely identify the user's browser. The company stores a token with the browser UID generated by them in the local storage of the user's computer. The controlled person, as the operator of the portal, uses cookies mainly for the purpose of processing visitor statistics, analyzing user preferences and displaying content that meets individual needs, displaying participation in polls, voting. In connection with the operation of the server, it determined the purposes and means of processing personal data of web portal users. It also uses providers (processors) to process them. Since from the connection of Article 4 point 1 and rec. 30 of the general regulation, it can be clearly concluded that it is necessary to consider cookie identifiers as personal data, which enable a connection with a specific natural person, it was established by the inspectors that the inspected person processes personal data as a controller. Furthermore, the inspection findings showed that the inspected person subject personal processes user data with consent in accordance with Article 6 paragraph 1 letter a) of the general regulation, according to the legitimate interest of the administrator according to Article 6 paragraph 1 letter f) of the general regulation, ev. also by fulfilling the legal obligation according to Article 6 paragraph 1 letter c) of the general regulation. Other data of registered visitors is processed on the basis of a contractual relationship according to Article 6, paragraph 1 letter b) of the general regulation. The controlled person fulfills the information obligation to the data subject set out in Article 12 of the general regulation, within the scope of Articles 13 and 14 of this regulation, and also fulfilled the obligation set out in Articles 15-23 of the general regulation when it established the procedures and properly informed the website users about their rights and their application. After evaluating the content of the submitted contracts, the inspectors concluded that the cooperation between the administrator and the processor is set up in a way that meets the requirements of Article 28, paragraphs 2 and 3 of the

General Regulation, which also provided the basis for the conclusion , that there is no violation of the basic obligation expressed in paragraph 1 of the cited regulation. The company was not found to have violated the obligation according to Article 25 and Article 32 of the general regulation, based on the evaluated risks in the processing of personal data of web portal users, the company adopted technical and organizational measures .

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