

Path: Home page > Main menu > Supervisory and decision-making activity Control of personal data processing in connection with sending offers (UOOU-04888/20)

Company

The inspection was initiated on the basis of a complaint from several complainants who were contacted by the company with an offer to buy out receivables from another company. The aim of the investigation was to find out where the company obtained the personal data of some of the complainants, where it had information about the claims in question, whether the data subject's rights are respected in connection with this processing and whether the personal data is processed in accordance with the general regulation. Although the company argued a legitimate interest in this processing, the inspectors evaluated the situation in such a way that it was not a matter of processing the personal data of the company's own clients. They were not in a contractual relationship with the controlled company and did not give consent to the processing of personal data for this purpose either. For this reason, the Office evaluated the sending of an offer to purchase receivables as a business communication. From that moment on, the control focused on compliance with the obligations set by the general regulation in the processing of personal data in connection with the sending of business communications. A local investigation was also carried out in connection with an oral hearing, where the investigation focused on compliance with the principles of personal data processing, compliance with the conditions of expression of consent and fulfillment of the obligation to provide information. Processing relationships, records of processing activities and technical-organizational security of processing were investigated. The inspection proved that the company processed personal data of data subjects without a proper legal title, that it did not provide data subjects with information about the processing of their personal data, especially from whom it obtained their personal data , for at least one year between 2019 and 2020. On the contrary, the Office evaluated the setting of the fulfillment of the rights of data subjects as in accordance with the general regulation, as well as the setting of processing security from a technical and organizational point of view. Administrative proceedings are currently being conducted with the company.

Links

[Anonymized inspection report \(UOOU-04888/20-22\) \[PDF, 311 KB\]](#)

ContextLocation: Document folders > Site map > Main menu > Supervisory and decision-making activities > Completed inspections > Inspections for the year 2021 > Inspection activity in the field of personal data protection - 2nd semester > Sale

of goods and services > Inspection of personal data processing in connection with sending offers (UOOU-04888/20)View

[current documents](#) | [document archive](#) | [documents including the archive](#)