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## Home Owners Association

The inspection was initiated based on a complaint. The inspection revealed that the inspected person published, through remote access to the repository, all documents created as part of the activities of the SVD, which contained personal data, while these documents were not necessary for exercising the rights and obligations of a member of the SVD according to § 1175 et seq. of Act No. 89/2012 Coll., Civil Code, such as name (title), current account number, name of the bank or SIPO, payer and beneficiary.

The audited SVD therefore violated the principle of personal data processing stated in Article 5 paragraph 1 letter c) Regulation (EU) 2016/679, i.e. that personal data must be processed appropriately and limited to the scope necessary for the purpose for which they are processed. The publication of personal data of the complainant and her family members also violated Article 6(1) of Regulation (EU) 2016/679. At the same time, it was proven that SVD allowed access to its website not only to its members, but also to an unknown number of third parties and at the same time did not ensure access logging. The audited person corrected the deficiencies during the procedure for remedial measures.

### Additional information:

When managing the agenda of the owners of the units or the cooperative, it is necessary to ensure that only authorized persons can familiarize themselves with the relevant documents, while in such cases personal data may only be provided or made available if there is a material and legal reason for this (e.g. the authorization of the owners or members to familiarize themselves with specific documents). However, it is not permissible to freely publish and post documents relating to individual matters, claims and disputes, containing personal data of owners or tenants. The rules for the processing of personal data do not prevent the normal disclosure of personal data (e.g. contact data for the building manager, the committee).

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