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On the basis of the inspection plan for 2018, the Office carried out an inspection, the subject of which was the processing of personal data in connection with the provision of so-called Smart cities services, namely in the matter of the service provider "Kolínská chytrá klylenka" (hereinafter also "Keychain"). The inspectors found that the controlled person processes the personal data of pupils and other persons in connection with the use of the contactless smart card Kolínská smart key as an identifier for the school canteen and an identifier for entering the bicycle room. Since September 2017, all pupils have received the key with the understanding that all its users (or parents or legal representatives) have expressed their consent to use the services that the Key Ring enables, if they have activated it to use the services offered. According to the claims of the controlled person and its founder, the City of Kolín, the Key Ring does not, in connection with the contract concluded with the Key Ring supplier, enable the linking of the services provided, nor as part of other services that can be set up with other providers for the Klíčěnka in connection with keeping a list of pupils by the inspected person when using the Klíčěnka in the school canteen, the inspectors found a violation of Regulation (EU) 2016/679, consisting in the fact that the list of users included pupils who do not use the Klíčěnka as an identifier for the school canteen. For this processing of personal data of pupils not eating in the school canteen, the inspected person did not have a legal title and the processing itself was therefore illegal. The Authority found that the inspected person violated the obligations set out in Article 5 paragraph 1 letter of a) (legality, correctness and transparency), letter b) (purpose limitation), letter e) (restriction of storage) and Article 6 paragraph 1 (lawfulness of processing) of Regulation (EU) 2016/679. Given that the inspected person immediately corrected the defective condition, the Office did not impose measures to eliminate the identified deficiencies. With regard to the fact that the Kolín V. Elementary School, Ovčárecká 374 is a public entity, the Office found it guilty of committing a misdemeanor in the administrative proceedings and pursuant to § 62 paragraph 5 of Act No. 110/2019 Coll. waived the fine. The inspection was conducted by the inspector PhDr. Petr Krejčí. Recommendation: The Office points to the fact that the processing of children's personal data should always be given increased attention, as they are among vulnerable data subjects. Children deserve special protection of personal data as they may be less aware of the risks, consequences and safeguards involved and of their rights in relation to the processing of personal data.

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