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Lender)

The inspection was carried out on the basis of the Inspection of the Office's plan for 2020. The subject of the inspection was compliance with obligations in: verification of processing procedures personal data when applying for a financial product, primarily in relation to the process of obtaining personal data, making copies of civil ones cards and their retention period (especially if the store is not closed at all, whatever at the initiative of the company or the client), fulfillment of the proper information obligation, fulfillment of the data subject's right "to be forgotten" in the sense of Article 17 of the general regulation.

The inspectors found that the inspected person was processing adequate, relevant and the necessary extent of personal data in relation to the individual purposes for which are processed correctly, legally and transparently, while personal does not process data for longer than is necessary to achieve the purposes for which have been processed. The processing of personal data is controlled by a person takes place: on the basis of consent data subject with the processing of his personal data for one or more specific purposes (e.g. the right of the controlled person in connection with enforcement of claims to publish data on the data subject together with data on existence debt, data subject consent for marketing purposes, consent to processing electronic signature, etc.) based on fulfillment contract, to take action received before the conclusion of the contract

at the request of the data subject, processing is necessary to fulfill a legal obligation (e.g. Act No. 257/2016 Coll., on consumer credit, Act No. 634/1992 Coll., on the protection of consumers, Act No. 253/2008 Coll., on certain measures against legalization of proceeds from criminal activity and terrorist financing, Act No. 586/1992 Coll., on income taxes, Act No. 563/1991 Coll., on accounting), based on the legitimate interests of the auditee or a third party, except cases where interests or fundamental rights take precedence over these interests and freedom of the data subject requiring protection of personal data. Copies of identity cards of controlled persons based on the law No. 253/2008 Coll., on certain measures against the legalization of criminal activities and financing of terrorism, and therefore as a liable person must perform client identification and control. The subject distinguishes two possible variants: concluding the contract exclusively through means of distance communication. The client is obliged to send the inspected person according to § 11 paragraph 7 of Act No. 253/2008 Coll. a copy of the identity card and more of a supporting document from which his identification data can be found according to Act No. 253/2008 Coll. The legal basis for obtaining a copy of the identity card is therefore the fulfillment of a legal obligation. entering into a contract, which is not concluded exclusively by means of distance communication. The client presents his identity card (citizen card) to the inspected person, from which the controlled person records his identification data. A copy in these cases, the inspected person obtains the ID card only with the prior consent of the client (consent is voluntary, conclusion of the contract not subject to this consent).

Time

the retention of personal data by the controlled person is 10 years and expires

from the maximum length of the limitation period according to Act No. 89/2012 Coll., civil

Code, and further from Act No. 253/2008 Coll. Controlled person protection information

personal data, i.e. also about its processing, is provided on its website

pages.

Controlled

the person has evaluated the severity and probability of the risks associated with the processing

personal data and subsequently adopted technical and organizational

measures to ensure a level of security appropriate to the given risk. By checking

no violation of the general regulation was found.

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