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On the basis of a complaint, the Office carried out an inspection, the subject of which was the processing of personal data in connection with the acquisition of copies of identity cards and photographs of customers' faces and the processing of requests to exercise the rights of data subjects in the provision of the product "Třetinka" by Alza.cz a.s. The complainant stated that the inspected person did not respond to withdraw consent to the processing of a copy of his ID card and a photo of his face when picking up the goods in the "Třetinka" product. This product consists in the fact that customers pay 1/3 of the purchase price for the ordered goods before receiving the goods, with the remaining 2/3 of the purchase price being paid within 3 months. The inspectors found that, in the case of the complainant, the inspected person processed personal data (a copy of the identity card and a photo) based on his consent, which the complainant, however, revoked. However, the inspected person did not process this request, due to employee misconduct. The controlled person thus processed the copy of the identity card and the photograph of the complainant's face without authorization, thereby violating Article 6, paragraph 1 of Regulation (EU) 2016/679 (legal title). At the same time, it violated Article 7, paragraph 3 of Regulation (EU) 2016/679 (withdrawal of consent), since withdrawing consent must be as easy as giving it. The inspectors also concluded that by not responding to the request for the exercise of the data subject's rights, specifically the revocation of consent to the processing of personal data, violated Article 12, paragraph 3 of Regulation (EU) 2016/679. The Office found that the controlled person violated the obligations set out in Article 6, paragraph 1, Article 7, Article 12 and Article 29 (processing on the instructions of the administrator) of Regulation (EU) 2016/679. Due to the fact that the inspected person immediately corrected the defective condition, the Office did not impose measures to eliminate the identified deficiencies. For this action, the Office imposed a fine of CZK 15,000 on the inspected person. The inspection was conducted by inspector Mgr. Daniel Rován. Recommendation: The data subject's request, including revocation of consent or raising an objection, is fundamentally obliged to be handled by the controller without undue delay, within one month at the latest. If the administrator does not process the request in time or if the data subject is not satisfied with the processing, he can contact the Office. The Office must document the request and the administrator's possible response to it.

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