

Path: Home page > Main menu > Supervisory and decision-making activity Processing of personal data by energy sellers

(UOOU-02100/20)

Company

The inspection was carried out on the basis of the Office's inspection plan for 2020. The inspection was focused on compliance with the general regulation with regard to compliance with the processing of personal data according to basic principles, sources of processed personal data, communication with data subjects and realization of their rights arising from the general regulation. Controlled person processes personal data in accordance with the legal conditions according to Article 6 paragraph 1 letter b), c), f) of the general regulation and further with the consent of data subjects for the purpose of marketing and improving services. The controlled person fulfills the information obligation on its website by publishing the document "Information on the processing of customer personal data", which contains transparent information according to Articles 12-14 of the General Regulation, including the individual rights of data subjects. The adopted technical and organizational measures of the controlled person are described in relation to the protection of personal data in particular in the document "Security policy and guidelines on the processing of personal data" as well as in the risk analysis and records of personal data processing activities. The inspection found that the inspected person does not keep records of accesses (logs) to personal data with regard to the very small risks of personal data processing and due to the small number of employees. In this context, the inspectors stated in the inspection report that logging of access to personal data is not directly established as an obligation of the administrator in the general regulation, but it nevertheless becomes a standard protection and a necessary part of the security of personal data. Furthermore, the inspectors stated that the administrator's choice not to log access to personal data is associated with greater responsibility for the data security measures taken. In the event that there is unauthorized access to personal data, or their misuse, and the administrator is not able to prove in that case who, when and for what purpose personal data was accessed unauthorized, he will be responsible for the resulting illegal consequences in full. Considering the small risks involved in the processing of personal data and the small number of employees, the inspectors decided not to consider the above-mentioned findings as a violation of Article 5, paragraph 1 letter f), or Article 32 of the General Regulation.

ContextLocation: Document folders > Site map > Main menu > Supervisory and decision-making activities > Completed inspections > Inspections for the year 2020 > Inspection activities in the field of personal data protection - 2nd semester > Sale

