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Retailer

The inspection was carried out on the basis of the Inspection of the Office's plan for 2021. Its subject was the verification of processing procedures personal data and obligations arising from the general regulation at use of the loyalty program and loyalty cards, including family cards customers, primarily focused on: verifying the principles of processing according to Article 5 (legality, minimization, storage limitations, integrity and confidentiality), legality of processing according to Article 6 (incl possible profiling), conditions for granting consent according to Article 7, enforcement of the rights of data subjects stipulated in Article 12 to Article 22 (focus on the provision of information to data subjects and the right to erasure), use of processors according to Article 28, security of processing according to Article 32 (security client database) of the general regulation.

The performed inspection found that the inspected person processes at use of the loyalty program and loyalty cards, including family cards customers, reasonable, relevant and necessary scope of personal data. Personal data are processed correctly, legally and transparently.

It is clear from the inspection findings that processing of personal data takes place either on the basis of consent or on the basis of performance contract or on the basis of a legitimate interest. The controller provides information about the processing personal data to the required extent.

The auditors further found that under the loyalty program automated processing of personal data takes place. Subject however, the data is not the subject of any decision based solely on

automated processing, including profiling. The controlled person keeps records of processing activities in accordance with Article 30 of the General Regulation. Except it has taken technical and organizational measures to ensure a level of security corresponding to the given risk.

By checking

no violation of the general regulation was found.

Links

Control report (UOOU-00893/21) [PDF, 360 kB]

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