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## Company

The inspection was carried out on the basis of a complaint. The complainant stated that the auditee's website read the complainant's keyboard and everything the complainant wrote in the customer chat was displayed by the chat operator. The complainant started to write his question on the chat of the inspected person, and before he had time to send it, the chat operator started to write back to him on this detailed question.

The auditee stated that his website is intended for presentation and informational purposes related to the company's business. Personal data is processed only in the part of the tour order, in the scope of: name, surname, e-mail and telephone contact of the customer.

Regarding the subject of the inspection, the representative of the inspected person stated that the chat interface is an externally supplied solution that is not intended for ordering services or processing personal data. Chat is not archived by the company. The auditee immediately suspended the use of the chat after learning about the initiative for the audit and asked the supplier to remove the functionality in question. The inspection found that the inspected did not process any personal data in the case of the complainant. The chat box service is provided by a supplier who has a contract with the subject, with the provision that the chat interface is not intended for ordering services or processing personal data. In addition, before using the chat, a warning is displayed and consent to the processing of personal data is requested in the event that the client enters it even without the operator's request on the basis of his own initiative, which the checked person documented with a screenshot of the screen. The possible development of the contract takes place outside the chat interface based on the legal title of Article 6 paragraph 1 letter b) Regulation (EU) 2016/679, because the controlled person processes personal data necessary for the performance of a contract to which the data subject is a party, or for the implementation of measures taken prior to the conclusion of the contract at the request of this data subject.

The inspection did not reveal a violation of Regulation (EU) 2016/679.

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