

**MuMB-03322/2023/VLa**  
**Director's Directive No. 19/2023**

dated 13 October 2023,  
which establishes the

**Principles for the Processing and Protection  
of Personal Data (GDPR)**

These are the Principles for the Processing and Protection of Personal Data (hereinafter "Principles") in the sense of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter "Regulation").

Further obligations arise from Act No. 110/2019 Coll., on the Processing of Personal Data, which, in certain respects, adapts the Czech legal system to the Regulation and sets out certain exceptions and possible offences including the amount of the fine.

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General Provisions

**Chapter I**

1. The Brno City Museum, a contributory organization (CIN: 00101427), is the controller of personal data (hereinafter "Controller").
2. The Controller guarantees, with full awareness of its responsibility and operational risks, to all data subjects within the meaning of Art. 4(1) of the Regulation (hereinafter "Subjects") that the processing of personal data within the meaning of Art. 4(2) of the Regulation (hereinafter "Processing") will be carried out with the adoption of technical, organizational, and personnel measures ensuring the required high level of data protection and in accordance with the Regulation.
3. The purpose of these Principles is to inform Subjects how the Controller processes the personal data entrusted to it.
4. As of 1 September 2023, the Controller appoints a Data Protection Officer (DPO) within the meaning of Articles 37–39 of the Regulation (hereinafter "DPO"):  
JUDr. Edita Lebedová, attorney-at-law (Data Box ID: hc7gzyi).

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Chapter II

1. The Controller processes personal data of Subjects under Article 6(1) of the Regulation, provided that at least one of the following legal grounds is present:
  - a) Processing is necessary for the performance of a contract to which the Subject is a party, or for taking steps at the request of the Subject prior to entering into a contract;
  - b) Processing is necessary for compliance with a legal obligation to which the Controller is subject;
  - c) Processing is necessary to protect the vital interests of the Subject or another natural person;

d) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;

e) Processing is necessary for the purposes of the legitimate interests pursued by the Controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Subject which require protection of personal data;

f) In cases of processing based on the Subject's consent – such consent must be freely given and revocable at any time. Consent must always be provided for a specific purpose of processing, which the Subject must be informed of.

2. In processing personal data, the Controller uses processors within the meaning of Art. 4(8) of the Regulation (hereinafter "Processors"). The Controller informs Subjects upon request about such processing. If the Controller uses Processors, it is obliged to define the conditions of processing contractually, either through a contract or another legal act, e.g., standard contractual clauses (in accordance with Articles 28–29 of the Regulation).

3. **Information and access to personal data:**

If personal data concerning the Subject are collected from the Subject, the Controller shall, upon request at the time of data collection, provide information under Article 13(1)(a)–(f) and 13(2)(a)–(f) of the Regulation.

If data are not obtained from the Subject, the Controller shall, upon request, provide information according to Article 14(1)(a)–(f), 14(2)(a)–(g), and in accordance with all conditions in paragraphs 3, 4, and 5 of Article 14.

4. According to Article 15 of the Regulation, the Subject has the right to obtain confirmation from the Controller as to whether or not personal data concerning them are being processed. If so, the Subject has the right to access such personal data and the information listed in Article 15(1)(a)–(h).

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## Chapter III

1. **Personal Data Breaches (Security Incidents, Articles 32–34 of the Regulation):**

Any personal data breach must be reported by the Controller without undue delay and, if possible, within 72 hours after becoming aware of it, to the supervisory authority in accordance with Article 55 of the Regulation — unless it is unlikely that the breach will result in a risk to the rights and freedoms of natural persons.

If the notification is not made within 72 hours, the reasons for the delay must be stated alongside the notification.

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**Zbyněk Šolc**

Director, Brno City Museum