



Number 2025/1530/12219/OSK

Bratislava date 20.08.2025

### Official record

to discontinue the processing regarding the complaint pursuant to Title IV of Part Five of the Act no. 18/2018 Coll. on Personal Data Protection and amending and supplementing certain Acts (hereinafter referred as „Slovak Data Protection Act“)

On 20 June 2024, the Office for Personal Data Protection of the Slovak Republic (hereinafter as "the Office") received the complainant's complaint, which was forwarded to the Czech supervisory authorities via the internal IMI system (Art. 56 no. 650942), in which ('the Sponsor') objected to the processing of its private email address from the publicly accessible website <https://limnospol.sk/>. It is available in pdf on the above website in document PARTICIPANT OF COLLECTION of 15. CONFERENCE OF THE CZECH LIMNOLOGICAL COMPANY AND THE SLOVAK LIMNOLOGICAL COMPANY listed together with other personal data of the complainant his e-mail address. His e-mail address is listed in two places in the collection, on page 173 (under the abstract of which he is the author) and on page 302 (in the address book of the conference participants). The document can be found at:

After examining the complaint and the cooperation provided and on the basis of Section 100(5)(a) of Act No 18/2018 the Office **discontinue** the complaint registered under number 01530/2024-Os.

### Justification

The complainant stated that he had exercised his right to erasure his personal data by the controller, the Slovak Limnological Society (SLS), tree times in total, in accordance with Article 17 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter as "GDPR"). The first request for deletion of personal data was sent on 21.02.2023 to email [info@limnospol.sk](mailto:info@limnospol.sk). Because SLS did not respond to his request, after three months on 21.05.2023 he sent a second request for deletion of his personal data to the same email. Neither did SLS respond to this request, nor did it take corrective action. For this reason, four months after the second request was sent, on 25.09.2023 he sent a third request for erasure. SLS has not yet responded to this request and continues to publish the content at issue with his personal data.

On the basis of the above, the Office by document No 01530/2024-Os-7 of 15.07.2024 (delivered pursuant to Section 29 of Act No 305/2013 on the electronic form of exercise of the powers of public authorities and amending certain acts (the e-Government Act) and received on 04.08.2024) requested pursuant to Section 109 of the Act No. 18/2018 Coll. for the provision of cooperation in the following scope:

1. Indicate whether you have published the complainant's private e-mail address in the aforementioned proceedings:
2. Please indicate the purpose and legal basis of this publication.
3. Please indicate whether you keep file of requests for erasure of personal data of the complainant, if so, how have you dealt with his requests, if you have not done so, please indicate the reason for not doing so.
4. Please provide any other information that is relevant to the case and that you consider as relevant.

In response to the letter of formal notice received on 21.01.2025 in respect of question 1, the SLS stated that:

*'A private e-mail address was provided by Mr. himself, of his own will,, for professional purposes, namely for the purposes of the collection of the 15th CLS and SLS conference in Třeboň in 2009. This collection was created by colleagues from the Czech Republic and provided by SLS, as is customary between these two sister companies for decades. Both companies publish the collection on their websites and so it was published on the website of both CLS and SLS'.*

As the purpose of the publication, the SLS stated that *'informing the scientific community about the course of the conference and the reports submitted, Mr. 1 provided his e-mail himself, voluntarily and aware of the fact that these proceedings are archived in university libraries, archives of scientific institutions and relevant webpages. I would point out that the proceedings have been published in various places since 2009 and so far, Mr. has not been bothered by this'.*

On point 3, the SLS stated that *'we have received a request to delete a private email from Mr. 1, we have accepted his reasons and we have fully complied with him'.* It is apparent from the attached email that *'Mr. 1 received the emails from our side, responded to them and, having proposed a specific solution with which he would be satisfied, he was satisfied'.*

The SLS attached *'an e-mail communication with Mr. from 2024, as well as a link to the website of the Slovak Limnological Society, which contains the proceedings in question with the deleted e-mail address of Mr 1 (<https://limnospol.sk/conferences-a-seminare/conferences-sls/>)'.*

The Office did not find an infringement of the GDPR or Act No 18/2018, it assessed the complaint under No 01530/2024-Os, which does not constitute a ground for initiating

proceedings on the protection of personal data, and therefore, in accordance with Section 100(5)(a) of Act No 18/2018, therefore the Office discontinued the complaint.

In the event that new relevant facts are found, the case may be examined in the procedure for the protection of personal data.

Head of the Department  
of administrative proceedings  
Office for Personal Data  
Protection of the Slovak Republic

