



Data Protection Inspectorate

/*for USE IN THE SYSTEM OF AUTHORISATION

Holder of information: Data Protection Inspectorate

Indication made: [REDACTED] 2026

The access restriction shall remain in force until: [REDACTED] 2026,
p2 until entry into force of the decision

Base: Section 35(1)(2) of the PIA, Section 35(1)18(2) of the PIA*/

Your [REDACTED].2025

Our [REDACTED] 2026 nr [REDACTED]

Reprimand and termination of supervision proceedings

In the proceedings of the Data Protection Inspectorate (DPI), [REDACTED] (data processor) has submitted a notice of infringement in connection with a cyber attack against these systems and a possible data leak.

The DPI sent enquiries to the data processor in order to establish the facts and, according to the explanations provided by the data processor, on [REDACTED] 2025, in the course of routine security monitoring, suspicious activity was detected in the trial server (staging server) used by the data processor for testing and development.

The trial server contains an older partial database from [REDACTED] 2024 and is not connected to a work server. *The trial server contained personal data of 381,729 data subjects. The server contained the following categories of personal data: name, e-mail address, phone number, home address, IP address, first 6 and last 4 digits of the payment card (not for all transactions), transaction information (purchased ticket information).* According to the data controller, it is likely that the payment data collected since [REDACTED] 2024 were accessed and that data subjects residing in EU Member States may have been affected. The exact number of data subjects and their country of origin cannot be identified.

Thus, this incident revealed that the data processor used personalised data in the trial server.

Since the DPI has the opinion that the use of actual personal data in the trial server is not allowed because it creates an increased risk to the protection of personal data, the DPI proposed to the data processor on [REDACTED] 2025 to stop the processing of actual personal data in the trial server. The Data Processor completed the proposal on [REDACTED] 2025.

Given that the data processor used actual personal data in the test environment, the processing of personal data was subject to an increased risk that was not mitigated and the risk materialised as a data leak.

Based on the above, [REDACTED] violated the requirements of the General Data Protection Regulation when using actual personal data in the test environment. In particular, such processing of personal data did not fulfil the security requirements of Article 5(1)(f)

1 The Supervision Authority commenced proceedings on the basis of Section 56(1) and (3)(8) of the Personal Data Protection Act. Legal basis for requesting clarifications: Sections 57-58 of the Personal Data Protection Act, Section 30(1) and (3) of the Law Enforcement Act, and Article 58(1)(a), (e) and (f) of the General Data Protection Regulation; in the case of an administrative authority, Section 75(2)(1)(1) of the Government of the Republic Act.

GDPR; and

Confidentiality requirement – personal data were processed in a manner that did not ensure protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

In addition to the above, the DPI considers that the data processor has fully cooperated with the Inspectorate and has terminated the processing of actual personal data in the trial server. More detailed statements and reasons concerning the incident can be found in the proposal of the DPI of [REDACTED] 2025, and therefore they are not repeated here.

Pursuant to Article 58(2)(b) GDPR, the Data Protection Inspectorate reprimands [REDACTED] and terminates the supervisory proceedings.

The addressee shall have 30 days to contest the reprimand and the notice of termination of the supervisory proceedings by submitting an appeal to an administrative court under the Code of Administrative Procedure.

Yours sincerely

(signed digitally)

[REDACTED]
solicitor
under the authority of the Director-General