

This diploma thesis deals with the legal aspects of income tax for natural and legal persons in contexts which may arise when dealing with cryptoassets of all kinds. The modern phenomenon of cryptoassets has been the subject of much discussion, especially in recent times, but legislation and comprehensive methodologies governing procedure for taxation of income are lacking. Therefore, the main objective of this thesis is to analyse income tax on cryptoassets for natural and legal persons. If we reformulate this objective into a question, it would be: How do we correctly tax income from cryptoassets for natural and legal persons?

Within the framework of my thesis, I also had to deal with the technological and legal aspects of cryptoassets and taxes. The concept of a cryptoasset, including its definition and content, is still a matter of debate even now, more than 10 years after its creation. Similarly, it was necessary to analyse the Czech legislation and determine what a cryptoasset is from the point of view of Czech law within the framework of the thesis.

By analysing the legislation and professional publications and using the deductive method, I came to the conclusion that the current legal framework in the Czech Republic is sufficient to answer the main question. The most frequent operations with cryptoassets for natural persons will be subject to the collective provisions of Section 10 of the Act on Income Tax, whereas there are, however, cases where handling of cryptoassets meets the conditions for application of other provisions of the Act. In the case of legal persons, I concluded that handling of cryptoassets will be very similar to that of individuals from a tax point of view. Possible deviations are captured in the thesis, especially with a focus on accounting issues, which are closely related to tax issues. Despite the conclusions which I have been able to draw, in my opinion, a number of legislative amendments are necessary to clarify the controversial areas which abound in the issue described.