

## Abstract

The thesis provides a comprehensive overview and analysis of the origin and development of the so-called resale right (“droit de suite”). The thesis begins by explaining the history of the first recognition of the right at the national level in France at the beginning of the 20th century and the recognition of the right at the international level. The thesis continues with a thorough analysis of the legislative history and content of the European Resale Right Directive of 2001, including a brief report on the implementation of the Directive. The thesis analyzes in detail the national legislation on the resale right in France, Germany, the UK, Ireland, California and Australia. There are several annexes attached; including comparative tables outlining some aspects of resale right legislation in the different countries.

A substantial part of the thesis focuses on the history and development of resale right legislation in the Czech Republic – from the right’s first introduction in Czechoslovakia in 1926 to the implementation of the Directive in the Czech Republic in 2000 and 2006. The thesis closes by offering suggestions *de lege ferenda* for Czech legislators; the suggestions are based on experiences with the practical application of the right in the Czech Republic and foreign legislation analyzed in the thesis.