

PRIVACY NOTICE

on the processing of personal data of contractual partners, contractual partners' contacts and accompanying persons and other persons participating in the Data Controller's events (hereinafter referred to as Data Subjects)

The **Central European Academy** (hereafter referred to as **Data Controller**) hereby informs the Data Subjects about the processing of personal data of the Data Controller's **contractual partners, contractual partners' contact persons and accompanying persons, as well as other persons attending the Data Controller's events**, in accordance with Regulation 2016/679. of the European Parliament and the Council (hereinafter referred to as **GDPR**) and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as **Privacy Act**).

Please read the Privacy Notice carefully.

This Privacy Notice is available on the website of the Data Controller(<https://centraleuropeanacademy.hu/dokumentum/>) and at its registered office indicated below, as well as at the venue of the events it organises . Data Subjects may access this Privacy Notice on the website. They may view, print and save it, but they may not modify it, only the Data Controller may do so.

The Data Controller may unilaterally amend this Privacy Notice at any time. In the event of an amendment to the Privacy Notice, the Data Controller shall send the amended Privacy Notice to the Data Subjects or, where the Data Subjects are acting on behalf of an entity that is a contractual partner, to the entity represented. In the latter case, it is the contractual partner's responsibility to inform the Data Subjects designated to be contact persons.

I. The Data Controller and its Data Protection Officer

Data Controller:

Central European Academy

Registered office:	1122 Budapest, Városmajor utca 12-14.
Registration number:	Education Office FNYF/419-4/2023
Tax number:	19359711-1-43
Statistical number:	19359711-7220-599-01

The Data Protection Officer of the Data Controller:

Réti, Várszegi & Partners Law Firm

Responsible employee: Dr. András Csenterics, lawyer, data protection and data security lawyer

Address: 1055 Budapest, Bajcsy-Zsilinszky út 78.

Email address: hu_central_european_academy@pwc.com

If the Data Subject wishes to exercise his or her rights or lodge a complaint regarding data protection issues, he or she may contact the Data Controller by sending a letter to the email address provided above, which is also the contact address of the Data Protection Officer. In addition, you may contact the Data Controller by postal mail at the above addresses.

II. Scope of personal data processed by the Data Controller, purpose, legal basis and duration of processing

(A) Data of persons who actively participate as speakers, moderators or otherwise in events organised by the Data Controller

Scope of data processed	Purpose of data processing	Legal basis for data processing	Duration of data processing
Name, email address, phone number	Preparation and performance of the agreement, including contact and identification of the Data Subject (for contract-related data processing, see also point II (D) of this notice)	The performance of the public tasks of the Data Controller for the establishment and operation of a legal and political science research education network, the support of research, training, publication and promotion activities, the organisation and development of domestic and international legal and political science relations and cooperation (legal basis under Article 6(1)(e) of the GDPR) in accordance with Annex 1, point 30 of Act IX of 2021 on Public Trust Funds Performing a Public Function.	Until the end of the event
Bank account number			Until the end of the retention period (8 years) pursuant to Article 169 of Act C of 2000 on Accounting
Image, sound, video	Recording and promotion of the event for scientific, educational and networking purposes		For 10 years from the date of the recording, or, if the recording contains a copyright work, for 5 years from the date of termination of the licence granted to the Data Controller.

Career details, information contained in a CV	Informing the audience about the professional experience of the people involved in the event, the content of the event, event promotion		For 5 years from the termination of the contract
Data on eating habits, food allergies	Taking into account the Data Subject's preferences and possible health considerations (e.g. food sensitivities) when providing meals	Article 6(1)(a) GDPR: consent of the Data Subject If the personal data provided include special data about eating habits (e.g. health, religious beliefs): The explicit consent of the Data Subject pursuant to Article 9(2)(a) GDPR	Until the termination of the contract or, if earlier, the withdrawal of consent
Data on the accommodation booking form <i>(for accommodation booked by the Data Controller)</i>	Booking accommodation and making check-in faster and easier.	Article 6(1)(a) GDPR: consent of the Data Subject	Until the termination of the contract or, if earlier, the withdrawal of consent
Information on the booking form for flights, trains and buses <i>(in case of booking by the Data Controller)</i>	Providing transport services	Article 6(1)(a) GDPR: consent of the Data Subject	Until the termination of the contract or, if earlier, the withdrawal of consent
Data in the travel document of the passenger car <i>(in case of car travel by the Data Controller)</i>	Providing transport services, settlement	Article 6(1)(a) GDPR: consent of the Data Subject	Until the termination of the contract or, if earlier, the withdrawal of consent
Name, date and place of birth, mother's name of the representative of the owner (e.g. lessor) of the car	Verifying the lawful use of the vehicle	Article 6(1)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent

<i>(if the owner of the car and the person travelling in it are different)</i>			
All of the personal data identified above – to the extent that their retention is necessary for the purposes of legal claims	Ensuring that the Data Controller has adequate evidence to assert or defend its legal position in the event of legal claims	Article 6(1)(f) GDPR: the legitimate interest of the Data Controller in being in possession of the relevant evidence in the event of legal proceedings.	Until the end of the applicable legal limitation period: 5 years from the termination of the contract (civil limitation period). If an actual legal claim is made concerning the contract, until the final and conclusive conclusion of the relevant legal proceedings.
Portrait photo <i>(If the Data Subject has provided such photo to the Data Controller)</i>	Ensuring that the Data Subject is recognised and contacted by the Data Controller's staff or another person acting on behalf of the Data Controller at an event organised by the Data Controller, thereby facilitating the smooth running of the event and enhancing the Data Subject's experience of participation.	Article 6(1)(a) GDPR: consent of the Data Subject	Until consent is withdrawn
If the Data Subject requests that the book he/she purchased at an event should be sent to him/her by post: <ul style="list-style-type: none"> • full name, • email address, • phone number, • shipping address, • other information provided by the Data Subject in connection with the service 	Shipping the ordered book to the Data Subject	Performance of a contract according to Article 6(1)(b) GDPR.	Until successful delivery

(B) Data of the persons accompanying the contributors referred to in point (A) or persons travelling with the contributors for whom the Data Controller is involved in the organisation of travel and accommodation

With regard to Data Subjects who are accompanying or travelling with the contributors falling within the scope of point (A) above and in whose travel and accommodation arrangements the Data Controller assists at the Data Subjects' explicit request, the Data Controller processes the following data:

Scope of data processed	Legal basis for data processing	Legal basis for data processing	Duration of data processing
Name, telephone number, email address	Registering the accompanying person for the event, ensuring their access to the event and identification	The performance of the public tasks of the Data Controller for the establishment and operation of a legal and political science research education network, the support of research, training, publication and promotion activities, the organisation and development of domestic and international legal and political science relations and cooperation (legal basis under Article 6(1)(e) of the GDPR) in accordance with Annex 1, point 30 of Act IX of 2021 on Public Trust Funds Performing a Public Function.	Until the end of the event
Picture, audio recording (if the Data Subject asks questions during the event), video recording	Recording and promotion of the event for scientific, educational and networking purposes		10 years from the date of the recording
Data on eating habits, food allergies	Taking into account the Data Subject's preferences and possible health considerations (e.g. food sensitivities) when providing meals	Article 6(1)(a) GDPR: consent of the Data Subject If the personal data provided include special data about eating habits (e.g. health, religious beliefs): The explicit consent of the Data Subject pursuant to Article 9(2)(a) GDPR	Until the end of the event or, if earlier, the withdrawal of consent

Data provided on the booking form, name, date and place of birth, passport number, telephone number, email address	Booking accommodation and making check-in faster and easier.	Article 6(1)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent
Information on the booking form for flights, trains and buses	Providing transport services	Article 6(1)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent
Data in the travel document of the passenger car (in case of traveling with the Data Controller)	Providing transport services, settlement	Article 6(1)(a) GDPR: consent of the Data Subject	Until the end of the event or, if earlier, the withdrawal of consent
If the Data Subject requests that the book he/she purchased at an event should be sent to him/her by post: <ul style="list-style-type: none"> • full name, • email address, • phone number, • shipping address, • other information provided by the Data Subject in connection with the shipment 	Shipping the ordered book to the Data Subject	Performance of a contract according to Article 6(1)(b) GDPR.	Until successful delivery

In all cases where the legal basis for processing is the consent of the Data Subjects, the Data Subjects may withdraw their consent to processing at any time by emailing to the email address of the Data Controller, where the mandatory data to be provided are name and email address, in order to enable the Data Controller to identify which Data Subject's data should be deleted.

In the event of withdrawal of consent, the Data Controller shall delete all data of the Data Subject processed by the Data Controller as described above. The obligation to erasure covers both electronic and paper-based data.

The Data Controller draws the attention of the Data Subjects to the fact that if their consent to data processing is withdrawn, certain operations based on consent (such as booking accommodation, purchasing flight tickets on behalf of the Data Subjects) will become impossible. In this case, the Data Subjects must perform these tasks themselves.

(C) Other participants attending the Data Controller's events

Scope of data processed	Legal basis for data processing	Legal basis for data processing	Duration of data processing
Name, email address, participant's institution	Registration for an event, identification of the participating Data Subject Recorded comments said at the events	The performance of the public tasks of the Data Controller for the establishment and operation of a legal and political science research education network, the support of research, training, publication and promotion activities, the organisation and development of domestic and international legal and political science relations and cooperation (legal basis under Article 6(1)(e) of the GDPR) in accordance with Annex 1, point 30 of Act IX of 2021 on Public Trust Funds Performing a Public Function.	Until the end of the event
Picture, audio recording (if the Data Subject asks questions during the event), video recording	Recording and promotion of the event for scientific, educational and networking purposes		10 years from the date of the recording
If the Data Subject requests that the book he/she purchased at an event should be sent to him/her by post: <ul style="list-style-type: none"> • full name, • email address, • phone number, • shipping address, • other information provided by the Data Subject in connection with the shipment 	Shipping the ordered book to the Data Subject	Performance of a contract according to Article 6(1)(b) GDPR.	Until successful delivery

(D) Personal data of tenderers, applicants, contractual partners and their contact persons

The Data Controller processes the personal data of **natural persons** (in particular sole traders and scholarships applicants) who have a contractual relationship with the Data Controller, who submit tenders to the Data Controller or who submit applications for a scholarship, as follows:

Scope of data processed	Legal basis for data processing	Legal basis for data processing	Data storage period, date of deletion
Name, email address, telephone number, shipping address, title, tax number or tax identification number, registered office	Processing and evaluation of the offer received, identification and contact during the evaluation of the tender and communication of the results	Article 6(1)(f) GDPR: legitimate interest of the Data Controller in the evaluation of the tender, if the evaluation of the tender does not fall within the scope of its public tasks. The performance of the public tasks of the Data Controller (legal basis under Article 6(1)(e) of the GDPR), if the evaluation of the tender falls under Annex 1, point 30 of Act IX of 2021 on Public Trust Funds Performing a Public Function.	The Data Controller shall keep the file containing personal data related to the evaluation of the tenders for 5 years from the date of the evaluation of the tenders in order to have sufficient evidence in case of legal claims, which is also in accordance with Article 46 (2) of the Public Procurement Act.
	Retention of tender documentation for the purpose of legal claims	Article 6(1)(f) GDPR: The Data Controller's legitimate interest in pursuing legal claims for procurements not covered by the Public Procurement Act	
		Article 6(1)(c) GDPR: Fulfilling the legal obligation under Article 46 (2) of the Public Procurement Act for procurements that fall within the scope of the Public Procurement Act	
The personal data recorded in the contract (in particular: name, email address, telephone number, postal address, registered office, tax number or tax identification)	Contract preparation and performance	The performance of the public tasks of the Data Controller (legal basis under Article 6(1)(e) of the GDPR) if the performance of the contract falls under Annex 1, point 30 of Act IX of	The Data Controller shall keep the records containing personal data relating to the performance of contracts for a period of 5 years from the performance of the contract in order to have sufficient evidence in case of legal claims,

number, bank account number, other contract data)		2021 on Public Trust Funds Performing a Public Function. If the performance of the contract does not fall within the scope of the public tasks of the Data Controller, the performance of the contract with the contractual partner (legal basis under Article 6(1)(b) GDPR)	which is also in accordance with Article 46 (2) of the Public Procurement Act.
	Retention of contract-related documentation to ensure legal redress	Article 6(1)(f) GDPR: The Data Controller's legitimate interest in pursuing legal claims for procurements not covered by the Public Procurement Act	
		Article 6(1)(c) GDPR: Fulfilling the legal obligation under Article 46 (2) of the Public Procurement Act for procurements that fall within the scope of the Public Procurement Act	
<p>Personal Data provided during the scholarship application: applicant's name, date and place of birth, mother's name, address, nationality, type and number of identity document, bank account details, telephone number, email address, details of employment held at the time of application, and Personal Data in the CV and cover letter.</p> <p>In case of a successful application, the scholarship amount paid.</p> <p>In case the applicant who has been awarded the scholarship</p>	<p>Assessing the application based on professional criteria, checking eligibility for the scholarship and contacting with the applicant</p> <p>In the case of a successful application, the administration and fulfillment of the scholarship agreement</p> <p>Contacting with the institution organising the training related to the scholarship and, to the</p>	<p>GDPR Article 6(1)(f): legitimate interest of the Data Controller in a professional and reasoned assessment of the applications</p> <p>In the case of a successful application, Article 6(1)(b) GDPR: performance of the contract (the scholarship agreement) with the Data Subject</p>	<p>During the period of the evaluation of the application and, if successful, until the end of the scholarship agreement</p> <p>The Data Controller reserves the right to keep the files containing personal data relating to the evaluation of applications for 5 years after the evaluation in order to have sufficient evidence in case of legal claims.</p>

does not take up the scholarship due to reasons beyond his/her control, the reasons for postponing the scholarship.	extent necessary, to forward the data of the scholarship applicant to that institution for the purpose of paying the scholarship		
Personal data included in documents classified as accounting records	Meeting accounting and tax obligations, invoicing	Legal obligations under Act C of 2000 and Act CL of 2017	With regard to documents subject to invoicing, until the end of the tax retention period (end of the calendar year in which the tax return is due + 5 years pursuant to Section 78(3) of Act CL of 2017) or accounting retention period (8 years pursuant to Section 169(2) of Act C of 2000)
Personal data contained in the contract between the Data Controller and the Data Subject, in the documents proving its performance and in vouchers relating to the payment to the Data Subjects	In the case of an audit by the State Audit Office of Hungary (SAO), the transfer of Personal Data (the documents recording them) to the SAO for the purpose of planning, determining and conducting the audit.	Legal obligation pursuant to Section 28 (2) of Act LXVI of 2011 on the State Audit Office of Hungary (SAO Act).	If the payment to the Data Subject is made from a grant to the Data Controller, the Data Controller shall keep the data (and the documents containing them) for as long as the SAO is entitled to verify the use of the grant (i.e. for five years after the calendar year of the use of the grant; see Article 23/A of the SAO Act).
Where the Data Subject creates and transfers an Intellectual Property to the Data Controller in performance of a contract with the Data Controller: the personal data content of the notification form as set out in Annex 2 to the Data Controller's Intellectual Property Policy for the Data Subject	Notification of Intellectual Property to the Data Controller and registration of Intellectual Property by the Data Controller	The legitimate interest of the Data Controller in the registration of Intellectual Property during the term of the contract with the Data Subject, and thereafter.	For 5 years from the last use of the Intellectual Property by the Data Controller.

The Data Controller shall carry out the following processing in relation to natural persons acting as a contact person for tenderer or contractual partners who are **non-natural persons**:

Scope of data processed	Legal basis for data processing	Legal basis for data processing	Data storage period, date of deletion
Name, email address, telephone number, shipping address, title	Contacts related to the tender or contract.	<p>The performance of the public tasks of the Data Controller (legal basis under Article 6(1)(e) of the GDPR) if the performance of the contract falls under Annex 1, point 30 of Act IX of 2021 on Public Trust Funds Performing a Public Function.</p> <p>If the performance of the contract does not fall within the scope of the public tasks of the Data Controller, the Data Controller has a legitimate interest (Article 6(1)(f) GDPR) to maintain contact with the tenderer or the contractual partner in connection with the tender, the preparation, conclusion and performance of the contract.</p>	Until the evaluation of the tender or during the duration of the contract or, if earlier, until the tenderer or contractual partner duly notifies the Data Controller that the contact person has been replaced.
Personal data contained in the contract between the Data Controller and the organisation represented by the Data Subject, in the documents evidencing its performance and in supporting documents relating to the payment to the organisation represented by the Data Subject	In the case of an audit by the State Audit Office of Hungary (SAO), the transfer of Personal Data (the documents recording them) to the SAO for the purpose of planning, determining and conducting the audit.	Legal obligation pursuant to Section 28 (2) of Act LXVI of 2011 on the State Audit Office of Hungary (SAO Act).	If the payment to the organisation represented by the Data Subject is made from a grant to the Data Controller, the Data Controller shall keep the data (and the documents containing them) for as long as the SAO is entitled to verify the use of the grant (i.e. for five years after the calendar year of the use of the grant; see Article 23/A of the SAO Act).
Where the Data Subject creates and transfers an Intellectual Property to the Data Controller in the context of the performance of a contract between the Data	Notification of Intellectual Property to the Data Controller and registration	The Data Controller's legitimate interest in the performance of the contract between the Data Controller and its contractual partner which is a non-natural person during the term	For 5 years from the last use of the Intellectual Property by the Data Controller.

Controller and a contractual partner which is a non-natural person (such as a university in cooperation with the Data Controller): the personal data content of the notification form as set out in Annex 2 to the Data Controller's Intellectual Property Policy for the Data Subject	of Intellectual Property by the Data Controller	of the contract and, thereafter, the Data Controller's legitimate interest in the registration of Intellectual Properties.	
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(E) Data processing in relation to the publication of data of public interest and data processed in relation to requests for data of public interest

Scope of data processed	Legal basis for data processing	Legal basis for data processing	Data storage period, date of deletion
The personal data of the scope of Data Subjects under points (A) and (D) which are necessary for the fulfilment of the publication obligation under the Privacy Act pursuant to Annex 1 of the Privacy Act (such as the names of the contractual parties of contracts involving the use of public funds or the management of public assets above HUF 5 million, the details of tenderers in certain tenders, etc.)	Fulfilling the publication obligation pursuant to Article 37 (1) (e) of the Privacy Act	Fulfilment of the legal obligation under Article 37 (1) (e) of the Privacy Act and Annex 1 of the Privacy Act	Until the end of the retention periods set out in Annex 1 of the Privacy Act depending on the type of data published.
If a given public interest data request would relate to the Data Subjects referred to in points (A) and (D) or to the contract concluded with them, the personal data (e.g. names of the contractual parties, names of the persons signing the contract) concerned by the public interest	Fulfilling data requests in the public interest, ensuring compliance with the provisions of the Privacy Act	Fulfilment of the legal obligation pursuant to Art. 26 (1) (e) of the Privacy Act	The Data Controller shall keep the personal data for one year from the date of execution or refusal of the public interest data request or, if the Data Controller does not respond to the data request within the time limit for execution of the data request, from the expiry of the time limit for execution, in order to be able to support its legal position in the event of legal claims (the Data

data request and provided by the Data Controller to the Data Subject			Controller also states that it may keep the personal data for other purposes after the retention period)
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III. Recipients of personal data and categories of recipients

Data processor:

The Data Controller uses the following data processor for the processing of the data covered by this notice:

Data processor	Purpose of data processing
Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland)	Use Google Forms to register for the event
The partner used by the Data Controller to take photos and videos of the events (information about the partner who will record the event can be obtained from the contact details provided in this Privacy Notice)	Recording the events

Individual data controller

Individual data controller	Purpose of data transfer
Directorate for Public Procurement and Supply	Fulfilling the obligation to provide information pursuant to Section 7 (1a) of Government Decree 168/2004 (25 May 2004) on the centralized public procurement system and the tasks and powers of the central purchasing body in the case of the purchase of hotel accommodation and passenger tickets (e.g. if the Data Controller books accommodation, flight or train tickets for guests attending the event)

The Data Controller does not transfer personal data outside the European Economic Area.

Individual data controller recipients

The Data Controller may transfer the personal data referred to in point II for the purpose of the administration of certain scholarship programmes and scientific cooperation and organisation to its cooperation partners, in particular the **Ministry of Justice**, the **Ferenc Mádl Institute of Comparative Law (MFI)**, the **Central European Law Association (KÖSZ)**, and the **Hungarian Association for Comparative Law (MÖJE)**, the **Faculty of Law of the University of Miskolc**, the **Central European Association for Comparative Law**, the **Institute of Justice in Warsaw**, the **Romanian Association for Comparative Law**, the **Scientific Association For Comparative Law, Poland** and the **Association for the Advancement of Comparative Law Researches in Serbia**

(hereinafter jointly referred to as: "**Partner(s)**"). These organisations are considered as **independent data controllers**, and Data Subjects can obtain further information on their data processing from the privacy notices of these organisations.

The Data Controller may cooperate with different partners for each event, the partners cooperating during the event can be found in the thematic documentation of the event concerned. You can find out more about all of the Data Controller's partners and their data processing activities by contacting: <https://centraleuropeanacademy.hu/en/partnereink/>. The Data Controller excludes its own responsibility for the processing carried out by its partners as independent controllers.

The personal data collected and processed for the organisation of the events **will be transmitted to the co-organisers of the events to the extent and scope directly necessary for the organisation and implementation of the event**; provided that in the case of each event, the Data Controller will inform the Data Subjects in advance of the co-organisers as recipients of the data transmission. The Data Controller excludes its own responsibility for the processing of the recipients of the transfer as **independent controllers**.

If the Data Controller is also involved in booking accommodation or organising travel, such as booking flights, buses or trains, the personal data **will also be transferred to the accommodation, tour operator or travel agency**. These recipients act **as independent data controllers**, and the Data Controller excludes its own liability for the processing carried out by them. The Data Controller shall not transfer the data processed in accordance with this Privacy Notice to third parties pursuant to the GDPR, except as set out above.

The Data Controller shall collect personal data relating to contracts concluded in the course of procedures under the Public Procurement Act, as defined by the Public Procurement Act Title "*Publicity in Public Procurement Procedures*" (Sections 42-45) (such as, but not limited to, the data contained in the contract concluded in the course of the procedure, the names of the parties to the contract, the names and tax numbers of the subcontractors involved in the performance of the contract, etc.) to the **Public Procurement Authority of Hungary** (1026 Budapest, Riadó utca 5.), the **National Development Centre of Hungary** (1077 Budapest, Wesselényi utca 20-22.) and other recipients specified therein **as independent data controllers**. In this case, the purpose of the transfer is to comply with the publication and reporting obligations imposed by the above provisions of the Public Procurement Act and to ensure lawful operation. The Public Procurement Authority of Hungary and the National Development Centre of Hungary disclose the personal data transmitted for the period specified in the Public Procurement Act (in particular for 5 years from the execution of the contract).

In the case of the purchase of books exhibited at individual events, the Data Controller undertakes to deliver the purchased books to the Data Subject by courier service, if the Data Subject expressly requests it. In this case, the Data Controller will transfer the personal data to the courier service as **independent data controllers**. Then, the purpose of the transfer is to fulfil the delivery obligation undertaken by the Data Controller in the framework of the sales contract. For information on the specific courier service that will deliver your data, please consult the contact details provided in this Privacy Notice.

However, the Data Controller is also entitled and obliged to communicate to the competent authorities and courts any personal data in its possession and stored by it in accordance with the law, and which it is obliged to communicate by law or by a final and binding order of an authority or court.

The data applicants with a public interest shall act as an independent controller with respect to the personal data covered by the data subject's request and transferred by the Data Controller in the course of fulfilling the Data Subject's request, and shall be independently responsible for the processing (use) of the personal data after the transfer.

As a general rule, the Data Controller does not transfer personal data outside the European Economic Area. However, if this is unavoidable, it will ensure in advance that a safeguard mechanism is in place to ensure an adequate level of protection of personal data in accordance with the GDPR.

Automated decision-making, profiling

The Data Controller does not carry out any automated decision-making or profiling in relation to the data processed in accordance with this Privacy Notice.

IV. Data security

I. Data security

The Data Controller respects the rights of Data Subjects under the law and, in accordance with the principle of data security, designs and implements its processing operations in a way that ensures the protection of the privacy of Data Subjects.

In order to ensure the security of personal data, the Data Controller takes in particular the following measures:

- the personal data can only be accessed by those authorised to do so, they cannot be accessed by others and cannot be disclosed to others, the Data Controller has defined the scope of authorised persons based on which employees' daily work requires the knowledge of the data;
- staff carrying out data processing may leave the premises where data processing is taking place only by locking the data media entrusted to them or by closing the office;
- the computers used in the processing are the property of the Data Controller or over which the Data Controller has the right to exercise control in order to protect personal data against unauthorised or unlawful processing, accidental loss, destruction or damage;
- access to the data on the computer is only possible with valid, personal, identifiable access rights - at least with a user name and password - and the Data Controller ensures that passwords are changed regularly;
- virus protection of the information systems processing personal data is continuously ensured by the Data Controller;
- in the event of a physical or technical incident, the Data Controller ensures the ability to restore access to and availability of personal data in a timely manner;
- the Data Controller regularly reviews its data processing;
- the Data Controller has adopted an internal data protection and data security policy and regularly provides data protection and data security awareness training to staff working with personal data;
- the Data Controller employs a Data Protection Officer with appropriate market reputation and expertise.

V. Rights of the Data Subject

In all cases, the rights referred to in this point may be exercised by using the contact details provided in point I. All questions, complaints and requests will be investigated individually and answered within one month of receipt at the latest. If necessary, taking into account the complexity of the application and the number of requests, this deadline may be extended by a further two months. In such a case, we will inform the Data Subject of the extension of the deadline within one month of receipt of the request, stating the reasons for the delay.

The Data Subject may request from the Data Controller access to personal data concerning him/her, rectification, erasure, and in certain cases restriction of processing, object to the processing of personal data and the right to data portability. The Data Subject also has the right to lodge a complaint with a supervisory authority, the right to a judicial remedy and, in the case of processing based on consent, the right to withdraw consent at any time. These rights are explained in detail below.

a) Right of access

The Data Subject shall have the right at any time to obtain information on whether and how his or her personal data are processed by the Data Controller, including the purposes of the processing, the recipients to whom the data have been disclosed or the source from which the data were obtained by the Data Controller, the retention period, his or her rights in relation to the processing and, in the case of transfers to third countries or international organisations, information on the safeguards relating thereto. In exercising the right to access, the Data Subject also has the right to request a copy of the data. Where the Data Subject's right of access adversely affects the rights and freedoms of others, in particular the business secrets or intellectual property of others, the Data Controller shall have the right to refuse to comply with the Data Subject's request to the extent necessary and proportionate.

b) The right to rectification

The Data Subject shall have the right to obtain from the Data Controller the rectification of inaccurate personal data relating to him or her. Depending on the purpose of the processing, the Data Subject has the right to request that incomplete personal data be completed, including by means of a supplementary declaration. If there is doubt about the corrected data, the Data Controller may request the Data Subject to provide the Data Controller with evidence of the corrected data in an appropriate manner, in particular by means of a document.

c) The right to erasure ("right to be forgotten")

Where the Data Subject requests the erasure of some or all of his or her personal data, the Data Controller shall erase them without undue delay where:

- the Data Controller no longer needs the personal data for the purposes for which it was collected or otherwise processed;
- the processing was based on the Data Subject's consent, but the Data Subject has withdrawn that consent and there is no other legal basis for the processing;
- the processing was based on a legitimate interest of the Data Controller or a third party, but the Data Subject has objected to the processing and there is no overriding legitimate ground for the processing;
- the personal data have been unlawfully processed by the Data Controller, or
- the erasure of personal data is necessary to comply with a legal obligation.

The Data Controller is not always obliged to delete personal data, in particular if the processing is necessary for the establishment, exercise or defence of legal claims.

d) Right to restriction of processing

Restriction of data means that during the period of restriction, the Data Controller will only store the data and will not perform any other operation on them.

The Data Subject may request the restriction of the processing of his/her personal data in the following cases:

- the Data Subject contests the accuracy of the personal data – in this case, the restriction applies for the period of time that allows the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful, but the Data Subject opposes the erasure of the data and instead requests the restriction of their use;
- the Data Controller no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or
- the Data Subject has objected to the processing – in which case the restriction applies for the period until the Data Controller has dealt with the objection.

d) Right to objection

Where the legal basis for processing data relating to the Data Subject is the legitimate interest of the Data Controller or a third party, or the performance of a public task, the Data Subject shall have the right to object to the processing. The Data Controller is not obliged to uphold the objection if the Data Controller proves that

- data processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the Data Subject, or
- the processing relates to the establishment, exercise or defence of legal claims by the Data Controller.

f) The right to data portability

Where the legal basis for the processing is the Data Subject's consent, the Data Subject has the right to receive the personal data provided in a structured, commonly used, machine-readable format (i.e. digital) and the right to request the transfer of those data to another controller, where such transfer is technically feasible, without hindrance from the Data Controller.

g) The right to lodge a complaint with a supervisory authority, judicial redress

If the Data Subject believes that his or her personal data have been misused, he or she can also contact the data protection authority and lodge a complaint, in particular in the Member State of his or her habitual residence, place of work or place of the alleged breach.

In Hungary, you can contact the Hungarian National Authority for Data Protection and Freedom of Information: address: H-1055, Hungary, Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, PO Box: 9.; phone: +36-1 391-1400; fax: +36-1 391-1410; email: ugyfelszolgalat@naih.hu; website: <http://naih.hu/>.

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Irrespective of their right to lodge a complaint, Data Subjects may also take legal action in the event of a breach of their rights in relation to the processing of their personal data. The Data Subject also has the right to take legal action against a legally binding decision of the supervisory authority. The Data Subject also has the right to judicial remedy if the supervisory authority does not deal with the complaint or does not inform the Data Subject within three months of the procedural developments or the outcome of the complaint.

This Privacy Notice is effective from 15 April 2025.



Dr. Heinerne Dr. Barzó Tímea Tünde
Director-General