



## THE RIGHT TO HEALTH PUBLIC BENEFIT ASSOCIATION PRIVACY POLICY

Effective 23 January 2021

Regarding the Privacy Policy by the Data Controller, in accordance with the provisions of Regulation 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereinafter: GDPR), **Right to Health Public Benefit Association** (registered office: 1145 Budapest, Columbus u. 29. 1. em. 2 .; registration number: 01-02-0013246; registration authority: Metropolitan Court; tax number: 18003022-1-42; represented by: Dr. Gábor Béla Lenkei, President (hereinafter: Data Controller or Company) hereby informs its members, donors, sponsors, event public and website visitors, as well as other persons involved in the data processing performed by him.

### 1. Concepts

**Service provider:** The Right to Health Public Benefit Association

**Home page:** All the content and services available under the following domain names and URL addresses: [www.jogazegeszseghez.hu](http://www.jogazegeszseghez.hu), [www.righttohealth.hu](http://www.righttohealth.hu), [www.nemvagyokbirka.hu](http://www.nemvagyokbirka.hu); [www.iamnotasheep.com](http://www.iamnotasheep.com)

**User:** The person visiting the home page.

### 2. What is the purpose of the present data processing?

In this Privacy Policy the Service Provider provides detailed information to the Users and the data subjects on the processing of their data on the website and in the course of the activities of the Service Provider Association.

### 3. What is the purpose of the Website?

The [www.jogazegeszseghez.hu](http://www.jogazegeszseghez.hu) and [www.righttohealth.hu](http://www.righttohealth.hu) websites are websites presenting the activities of the Service provider Association. The Association publishes on their website periodically the most important announcements on the Website, publishes the bank account number receiving donations. On the website anyone can register to be a member of the Association, members and sponsors can pay the membership fee by credit card payment, or submit the



amount of support / donation they wish to give us, ask questions, or initiate communication with the Service Provider. Periodically it is also possible to purchase tickets for the Service Provider's events.

On the [www.nemvagyokbirka.com](http://www.nemvagyokbirka.com) ([www.iam\\_notasheep.com](http://www.iam_notasheep.com)) Website, sponsors and sympathizers can apply to participate in the distribution of various publications of the Association.

#### **4. How does the Privacy Policy apply to data subjects?**

By accessing the Website, using the services available from the Website, and using the functions of the Website, the Users automatically acknowledge the contents of this Privacy Policy without any further legal notices.

The members of the Service Provider Association acknowledge the contents of this Privacy Policy by applying to the association, while the sponsors and donors adhere to the contents of this Privacy Policy by paying their membership fee and donations.

#### **5. Who can modify the Privacy Policy and how and where will the Service Provider publish it?**

The Service Provider is entitled to unilaterally amend this Privacy Policy at any time. The Service Provider publishes the amendments to the Privacy Policy by publishing the consolidated Privacy Policy on the Website. Those concerned are asked to read the Privacy Policy carefully each time they visit the Website.

This Privacy Policy is continuously available on the Website. The data subjects may open the website to view the Privacy Policy, print it out, save it, but may not modify it, only the Service Provider is entitled to do so.

This Privacy Policy is also available in printed form at the registered office of the Service Provider.

#### **6. What personal information of yours do we process, for how long, what do we use it for, and under what authority?**

The legal bases for our data processing are the following:

- a) voluntary consent of the user to the data processing, based on informed consent, in accordance with Article 6 (1) (a) of the GDPR (hereinafter **Consent**);



- b) according to Article 6 (1) (c) of the GDPR, data processing is necessary for compliance with the legal obligation of the data controller (such as complying with the accounting and bookkeeping obligation - hereinafter: **complying with legal obligation**)
- c) according to Article 6 (1) (f) of the GDPR, the processing is necessary for the legitimate interests of the controller or of a third party (hereinafter: **legitimate interest**)

**6.1. Data processing in order to stay in touch, ie to send Newsletters**

The Service Provider sends marketing e-mails to the persons who have consented to it, which contain information related to expanding the selection of films and services on the Service Provider's website. The Service Provider also informs the subscribers about important events and novelties.

The Service Provider processes the following data of the recipients for the purpose of sending a newsletter:

A Category of processed data	B Source of data	C Purpose of data processing	D Legal basis of data processing	E Duration of data processing, time of deletion
name	From the subject	sending electronic and postal direct marketing messages offering and containing offers, advertisements, discounts, promotions and other benefits for marketing purposes by direct address	GDPR Art. 6 § (1) Section (a): Consent	Until consent is revoked
e-mail address	From the subject	sending electronic and postal direct marketing messages offering and containing offers, advertisements, discounts, promotions and other benefits for marketing purposes by direct address	GDPR Art. 6 § (1) Section (a): Consent	Until consent is revoked

**Users may withdraw their consent to data processing at any time and request that Service Provider delete their data from, by way of an E-mail sent to the Service Provider's below E-mail address.**



Newsletter recipients can unsubscribe from the newsletter or direct marketing messages by clicking on unsubscribe or similarly named link at the end of each newsletter or electronic direct market message, or by sending a letter to the Service Provider's e-mail address or postal address below, thereby revoking their consent to data processing.

In the case of unsubscribing, your e-mail address and name will be deleted from our newsletter database and we will no longer send a newsletter or direct marketing message to that address.

If you unsubscribe, you can re-subscribe to our newsletter at any time. Subscribing to the newsletter is not a condition for using any of our other services. An e-mail address and name are required to subscribe to the e-newsletter, without which it is not possible to subscribe.

**6.2. Data processing related to those who fill in the contact form on the Website**

The User may contact the Service Provider by providing his / her contact details on the website, he / she may send a message to them by way of an E-mail by filling in and submitting the contact form on the Website. The Service Provider handles the following data about the User in connection with the following:

A	B	C	D	E
Category of processed data	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data processing, time of deletion
Name	Subject	Answering questions, Answering questions,	GDPR Art. 6 § (1) Section a): Consent	Until consent is revoked
E-mail address	Subject	Answering questions, Answering questions,	GDPR Art. 6 § (1) Section a): Consent	Until consent is revoked
Data involved in message	Subject	Answering questions, Answering questions,	GDPR Art. 6 § (1) Section a): Consent	Until consent is revoked

**Users may withdraw their consent to data processing at any time and request that their data be deleted by Service Provider, in an E-mail sent to the Service Provider's below E-mail address.**



### 6.3. Data processing related to the subscribers / persons filling in the form on the Website

By providing his name, E-mail address and home address / delivery address on the website, the User may subscribe to receive publications of the Association (eg informative DVDs, badges). Users who want to operate a pick-up point can also apply here. In possession of the data, the Association will send the publication to the nearest collection point of the applicant for the subscriber to pick it up. In the case of applying as a pick-up point, the Service Provider will deliver its publications to that pick-up point. Regarding this, the Service Provider processes the following data of the User:

A	B	C	D	E
Category of processed data	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data processing, time of deletion
Name	Subject	Processing applications	GDPR Art. 6 § (1) Section a): Consent	Until consent is revoked
E-mail address	Subject	Processing applications	GDPR Art. 6 § (1) Section a): Consent	Until consent is revoked
Home address/Delivery address	Subject	Processing applications	GDPR Art. 6 § (1) Section a): Consent	Until consent is revoked

Users may withdraw their consent to data processing at any time and request that their data be deleted by the Service Provider, in an e-mail sent to the Service Provider's below e-mail address.

### 6.4. Data processing related to the purchase of tickets for events on the Website

On the website [www.jogazegeszseghez.hu](http://www.jogazegeszseghez.hu) Users can periodically buy tickets for events organized by the Association.

The website is operated by the Right to Health Public Benefit Association, whose contact details are provided in Section 7 of present Privacy Policy. They are regarded as Data Controller with regard to the personal data of natural persons purchasing on the website.



The Right to Health Public Benefit Association handles the following information about natural person buyers in connection with the purchase of tickets on the website:

The source of all data is the customer concerned. (C)

<b>A</b> Category of processed data	<b>B</b> Source of data	<b>D</b> Legal basis of data processing	<b>E</b> Duration of data processing, time of deletion
Name	a) Creating the contract b) Performing the contract c) Claim and enforcement d) Identification e) Liaison f) Invoicing	For the purpose of Section B / a), b), d) and e): Art. 6 § (1) GDPR. Section b): Creation and completion of a contract  For the purpose of Section B / c): GDPR Art. 6 § (1) Section (f): Legitimate interest  For the purpose of Section B/f): GDPR Art. 6 Section (1) § c): completion of a legal obligation: in the case of data necessary for compliance with tax obligation: Act CL. („Art.“) of 2017, Section 78, § (3), 202 § (1). In the case of documents required for for compliance with an accounting obligation: Act C. of 2000 („Sztv.)§ 168-169.	Documents necessary for compliance with tax obligation: for 5 years from the last day of the calendar year in which the tax declaration, data declaration, declaration should have been made or, in the absence of a declaration, data declaration or declaration the tax should have been paid, and the documents required for accounting obligation: for 8 years from the date of termination of the contract. In every other case the data must be kept for 5 years after the termination of the given legal relationship.
E-mail address	a) Creating the contract b) Performing the contract c) Claim and enforcement d) Identification e) Liaison	For the purpose of Section B / a), b), d) and e): Art. 6 § (1) GDPR. Section b): Creation and completion of a contract  For the purpose of Section B / c): GDPR Art. 6 § (1) Section (f): Legitimate interest	Documents necessary for compliance with tax obligation: for 5 years from the last day of the calendar year in which the tax declaration, data declaration, declaration should have been made or, in the absence of a declaration, data declaration or declaration the tax should have

			been paid, and the documents required for accounting obligation: for 8 years from the date of termination of the contract. In every other case the data must be kept for 5 years after the termination of the given legal relationship.
Phone number	<ul style="list-style-type: none"> <li>a) Creating the contract</li> <li>b) Performing the contract</li> <li>c) Claim and enforcement</li> <li>d) Identification</li> <li>e) Liaison</li> </ul>	<p>For the purpose of Section B / a), b), d) and e): Art. 6 § (1) GDPR. Section b): Creation and completion of a contract</p> <p>For the purpose of Section B / c): GDPR Art. 6 § (1) Section (f): Legitimate interest</p>	<p>Documents necessary for compliance with tax obligation: for 5 years from the last day of the calendar year in which the tax declaration, data declaration, declaration should have been made or, in the absence of a declaration, data declaration or declaration the tax should have been paid, and the documents required for accounting obligation: for 8 years from the date of termination of the contract. In every other case the data must be kept for 5 years after the termination of the given legal relationship.</p>
Billing address	<ul style="list-style-type: none"> <li>a) Creating the contract</li> <li>b) Performing the contract</li> <li>c) Claim and enforcement</li> <li>d) Identification</li> <li>e) Liaison</li> <li>f) Invoicing</li> </ul>	<p>For the purpose of Section B / a), b), d) and e): Art. 6 § (1) GDPR. Section b): Creation and completion of a contract</p> <p>For the purpose of Section B / c): GDPR Art. 6 § (1) Section (f): Legitimate interest</p> <p>For the purpose of Section B/f): GDPR Art. 6 Section (1) § c): completion of a legal obligation: in the case of data necessary for compliance with tax obligation: Act CL. („Art.“) of 2017, Section 78, § (3), 202 § (1). In the case of documents required for for compliance with an accounting obligation: Act C. of 2000</p>	<p>Documents necessary for compliance with tax obligation: for 5 years from the last day of the calendar year in which the tax declaration, data declaration, declaration should have been made or, in the absence of a declaration, data declaration or declaration the tax should have been paid, and the documents required for accounting obligation: for 8 years from the date of termination of the contract. In every other case the data must be kept for 5 years after the termination of the given legal relationship.</p>



		(„Sztv.)§ 168-169.	
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**Indication of the legitimate interest of the Service Provider:**

- a) **Data processed for claim and enforcement purposes:** In the case of a purchase on the website, the data of the purchaser is used by the Right to Health Public Benefit Association for the settlement of legal disputes arising from the existing contract, for possible litigation, non-litigation or other official proceedings. These data are managed by the Right to Health Public Benefit Association so that if a dispute arises with the buyer in connection with the contract, these data can be used by the Right to Health Public Benefit Association for evidentiary purposes. The Right to Health Public Benefit Association may exercise this right within the limitation period. Data processing is therefore necessary to protect the rights and legitimate interests of the Right to Health Public Benefit Association. The purpose of data processing cannot be achieved otherwise.
- b) **Data processed for the purpose of contact and identification necessary for the creation and fulfillment of the contract:** The Right to Health Public Benefit Association will contact the customer, with regard to the contract they have established by shopping in the webstore, using the availability provided, confirming the order by an E-mail and using telephone number provided in the event of a problem, question or delivery, so it is necessary to process the customer's contact details. It is in the common interest of the Right to Health Public Benefit Association and the customer contracted with it to liaise in connection with the contract and the purchase on the website. The purpose of data processing cannot be achieved in any other way, liaison cannot be established without contact information.

**Those concerned may object to above processing that is based on a legitimate interest by sending an E-mail to the E-mail address of the Right to Health Public Benefit Association indicated in point 7.**

**6.5. Data processing related to photo and video recording at events**

The Service Provider takes photos of the participants at the events they organize and uses them in its online and offline marketing materials. The Service Provider processes the following data in this field:

<b>A</b>	<b>B</b>	<b>D</b>	<b>E</b>
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Category of processed data	Purpose of data processing	Legal basis of data processing	Duration of data processing, time of deletion
Portrait (photo, video)	Use on websites, in marketing and in other printed and electronic materials of the Association and in publications for illustration and marketing purposes	GDPR Art. 6. §(1) Section a): Consent	Until consent is revoked

The Service Provider draws attention to the fact that in case of displaying a portrait or photo in a printed publication, it is not possible to destroy, revoke, recall, get the photo back from the addressees or otherwise delete the photo from the publication even after the consent has been withdrawn. The data subject consents to the taking and using of his photo aware of this limitation. The data subject is free to withdraw his / her consent at any time, taking into account the above restrictions, by sending a message to below contact details of the Service Provider.

#### 6.6. Data processing related to prospective and existing members of the association (regular, patron and honorary members)

The Service Provider processes the personal data of natural person members who apply on the Website or in any other way, as follows:

A	B	C	D	E
Category of processed data	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data processing, time of deletion
Name	Member concerned	a) Applying to the association, considering the application b) Membership and membership fee records c) Claims and enforcement d) Information about the activities of the association, communication and	In the case of purpose C/c): GDPR Art. 6 § (1) Section (f): legitimate interest of the Association  In the case of purpose C/a), d) and f): GDPR Art. 6 § (1) Section (a): member's consent  In the case of purpose C/b): GDPR Art. 6 § (1) Section c): for compliance with legal	Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.  The documents necessary for compliance with tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been

		<p>liaison with members</p> <p>e) Complying with obligations regarding tax, social security and other legal reporting, declaration, registration obligations, related to membership fees, donations</p> <p>f) Event related data processing</p>	<p>obligation governing the Association — Act V. of 2013 on the Civil Code (Ptk.) 3:63. § (1) and 3:66. § (1) - registration obligation</p> <p>In the case of purpose C/d) : GDPR Art. 6 (1) Section c): for compliance with legal obligation governing the Association — in the case of data necessary for compliance with tax obligation, Act CL. („Art.“) 78.§(3), 202.§(1) of of 2017 on the order of taxation. In the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”)</p>	<p>paid, in the absence of declaration, data declaration or notification.</p> <p>The documents required for compliance with accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and enforcement purposes, the data will be kept for 5 years after the termination of the membership.</p>
Mother's name	Member concerned	<p>a) Applying to the association, considering the application</p> <p>b) Membership and membership fee records</p> <p>c) Claims and enforcement</p> <p>d) Complying with tax, social security and other legal reporting, declaration, registration obligations and meeting other obligations related to membership fees, donations</p>	<p>In the case of purpose C/c): GDPR Art. 6 § (1) Section (f): legitimate interest of the Association</p> <p>In the case of purpose C/a), d) and f): GDPR Art. 6 § (1) Section (a): member's consent</p> <p>In the case of purpose C/b): GDPR Art. 6 § (1) Section c): for compliance with legal obligation governing the Association — Act V. of 2013 on the Civil Code (Ptk.) 3:63. § (1) and 3:66. § (1) - registration obligation</p>	<p>Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.</p> <p>The documents necessary for compliance with tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid, in the absence of declaration, data declaration or notification.</p> <p>The documents required for compliance with</p>

			<p>In the case of purpose C/d) : GDPR Art. 6 (1) Section c): for compliance with legal obligation governing the Association — in the case of data necessary for compliance with tax obligation, Act CL. („Art.“) 78.§(3), 202.§(1) of of 2017 on the order of taxation. In the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”)</p>	<p>accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and enforcement purposes, the data will be kept for 5 years after the termination of the membership.</p>
Permanent address	Member concerned	<p>a) Applying to the association, considering the application</p> <p>b) Membership and membership fee records</p> <p>c) Claims and enforcement</p> <p>d) Information about the activities of the association, communication and liaison with members</p> <p>e) Complying with obligations regarding tax, social security and other legal reporting, declaration, registration obligations, related to membership fees,</p>	<p>In the case of purpose C/c): GDPR Art. 6 § (1) Section (f): legitimate interest of the Association</p> <p>In the case of purpose C/a), d) and f): GDPR Art. 6 § (1) Section (a): member's consent</p> <p>In the case of purpose C/b): GDPR Art. 6 § (1) Section c): for compliance with legal obligation governing the Association — Act V. of 2013 on the Civil Code (Ptk.) 3:63. § (1) and 3:66. § (1) - registration obligation</p> <p>In the case of purpose C/d) : GDPR Art. 6 (1) Section c): for compliance with legal obligation governing the Association — in</p>	<p>Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.</p> <p>The documents necessary for compliance with tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid, in the absence of declaration, data declaration or notification.</p> <p>The documents required for compliance with accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and</p>



		<p>donations</p> <p>f) Event related data processing</p>	<p>the case of data necessary for compliance with tax obligation, Act CL. („Art.“) 78.§(3), 202.§(1) of of 2017 on the order of taxation. In the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”)</p>	<p>enforcement purposes, the data will be kept for 5 years after the termination of the membership.</p>
Date of Birth	Member concerned	<p>a) Applying to the association, considering the application</p> <p>b) Membership and membership fee records</p> <p>c) Claims and enforcement</p> <p>d) Complying with obligations regarding tax, social security and other legal reporting, declaration, registration obligations, related to membership fees, donations</p>	<p>In the case of purpose C/c): GDPR Art. 6 § (1) Section (f): legitimate interest of the Association</p> <p>In the case of purpose C/a), d) and f): GDPR Art. 6 § (1) Section (a): member's consent</p> <p>In the case of purpose C/b): GDPR Art. 6 § (1) Section c): for compliance with legal obligation governing the Association — Act V. of 2013 on the Civil Code (Ptk.) 3:63. § (1) and 3:66. § (1) - registration obligation</p> <p>In the case of purpose C/d) : GDPR Art. 6 (1) Section c): for compliance with legal obligation governing the Association — in the case of data necessary for compliance with tax obligation, Act CL. („Art.“) 78.§(3), 202.§(1) of of 2017 on the order of taxation. In the case of documents</p>	<p>Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.</p> <p>The documents necessary for compliance with tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid, in the absence of declaration, data declaration or notification.</p> <p>The documents required for compliance with accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and enforcement purposes, the data will be kept for 5 years after the termination of the membership.</p>

			required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”)	
Tax identification number	Member concerned	<ul style="list-style-type: none"> <li>a) Applying to the association, considering the application</li> <li>b) Membership and membership fee records</li> <li>c) Claims and enforcement</li> <li>d) Complying with obligations regarding tax, social security and other legal reporting, declaration, registration obligations, related to membership fees, donations</li> </ul>	<p>In the case of purpose C/c): GDPR Art. 6 § (1) Section (f): legitimate interest of the Association</p> <p>In the case of purpose C/a), d) and f): GDPR Art. 6 § (1) Section (a): member's consent</p> <p>In the case of purpose C/b): GDPR Art. 6 § (1) Section c): for compliance with legal obligation governing the Association — Act V. of 2013 on the Civil Code (Ptk.) 3:63. § (1) and 3:66. § (1) - registration obligation</p> <p>In the case of purpose C/d) : GDPR Art. 6 (1) Section c): for compliance with legal obligation governing the Association — in the case of data necessary for compliance with tax obligation, Act CL. („Art.”) 78.§(3), 202.§(1) of of 2017 on the order of taxation. In the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”)</p>	<p>Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.</p> <p>The documents necessary for compliance with tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid, in the absence of declaration, data declaration or notification.</p> <p>The documents required for compliance with accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and enforcement purposes, the data will be kept for 5 years after the termination of the membership.</p>
ID card	Member	a) Applying to the	In the case of purpose C/c): GDPR Art. 6 §	Duration of data processing for the purpose of



number	concerned	<p>association, considering the application</p> <p>b) Membership and membership fee records</p> <p>c) Claims and enforcement</p> <p>d) Complying with obligations regarding tax, social security and other legal reporting, declaration, registration obligations, related to membership fees, donations</p>	<p>(1) Section (f): legitimate interest of the Association</p> <p>In the case of purpose C/a), d) and f): GDPR Art. 6 § (1) Section (a): member's consent</p> <p>In the case of purpose C/b): GDPR Art. 6 § (1) Section c): for compliance with legal obligation governing the Association — Act V. of 2013 on the Civil Code (Ptk.) 3:63. § (1) and 3:66. § (1) - registration obligation</p> <p>In the case of purpose C/d) : GDPR Art. 6 (1) Section c): for compliance with legal obligation governing the Association — in the case of data necessary for compliance with tax obligation, Act CL. („Art.“) 78.§(3), 202.§(1) of of 2017 on the order of taxation. In the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”)</p>	<p>membership registration and data processing for information and communication purposes: until the termination of the membership status.</p> <p>The documents necessary for compliance with tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid, in the absence of declaration, data declaration or notification.</p> <p>The documents required for compliance with accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and enforcement purposes, the data will be kept for 5 years after the termination of the membership.</p>
Mailing address	Member concerned	<p>a) Applying to the association, considering the application</p> <p>b) Information about the activities of the</p>	<p>GDPR Art. 6 § a) Section (1) § a): Member consent</p>	<p>Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.</p>



		association, communication and liaison with members c) Event related data processing		Event management: for 1 month after the end of the event.
E-mail address	Member concerned	a) Applying to the association, considering the application b) Information about the activities of the association, communication and liaison with members c) Event related data processing	GDPR Art. 6 § a) Section (1) § a): Member consent	Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.  Event management: for 1 month after the end of the event.
Phone number	Member concerned	a) Applying to the association, considering the application b) Information about the activities of the association, communication and liaison with members c) Event related data processing	GDPR Art. 6 § a) Section (1) § a): Member consent	Duration of data processing for the purpose of membership registration and data processing for information and communication purposes: until the termination of the membership status.  Event management: for 1 month after the end of the event.
Username	Member concerned	Identification, entry into the online Association system	GDPR Art. 6 § a) Section (1) § a): The consent of the person concerned	Until the termination of the membership status.
Password	Member concerned	Identification, entry into the online Association system	GDPR Art. 6 § a) Section (1) § a): The consent of the person concerned	Until the termination of the membership status.



The amount of the donation	Member concerned	Complying with tax, social security and other legal reporting, declaration, registration and other obligations	GDPR Art. 6 (1) Section c): for compliance with legal obligation governing the Association — in the case of data necessary for compliance with tax obligation, Act CL. („Art.”) 78.§(3), 202.§(1) of of 2017 on the order of taxation. In the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”)	The documents necessary for compliance with tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid, in the absence of declaration, data declaration or notification.  The documents required for compliance with accounting obligation will be kept for 8 years from the termination of the contract.
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**The data subject is free to withdraw his consent at any time by sending a message to the contact details of the Service Provider below.**

Indication of legitimate interest:

- a) **Enforcement of claims and rights:** The Service Provider processes these data so that if a dispute or a claim arises against the member, if a dispute arises with the member regarding above data or concerning them, the Service Provider may use these data for evidentiary purposes. The Service Provider can exercise this right under the Civil Code, within the general limitation period of 5 years. Data processing is therefore necessary in order to protect the rights and legitimate interests of the Service Provider. The purpose of data processing cannot be achieved otherwise.

**The member may object separately to the data management that is based on a legitimate interest, in which case the Service Provider shall not further process the member's data, unless he proves that the data processing is justified by compelling legitimate reasons that take precedence over the data subject's interests, rights and freedoms, or relating to the filing, enforcement or defense of legal claims.**

#### **6.7. Processing of the members contact details of the Association legal entity**





The Service Provider, as Association, in case of the members of the legal entity and in the interest of liaising with the legal entity processes and keeps below personal data of the contact persons of the legal entity members:

A	B	C	D	E
Category of the data processed	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data storage, time of deletion
Name Mailing address E-mail address Phone number	The member concerned	Information regarding the activities of the Association, communication and liaison with members.	GDPR Art. 6. § (1) Section f): Legitimate interest	Until the termination of the member status

Identification of the legitimate interest:

- a) **Information, communication and contact with the legal entity member:** The data controller and the legal entity's member of the Association have a common interest in maintaining contact with each other in connection with the activities of the Association. In the case of a legal entity, liaison can only take place through a natural person contact, so the processing of the contact data of these contact persons is necessary for the communication. The purpose of data processing cannot be achieved in any other way, the liaison cannot be achieved without contact information.

**The member's contact person may object separately the data processing that is based on a legitimate interest, in which case the Service Provider shall not further process the member contact person's data, unless he proves that the data processing is justified by compelling legitimate reasons that take precedence over the data subject's interests, rights or they are relating to the submission, exercise or defense of legal claims.**

#### 6.8. Processing the data of the senior officials of the legal entity members of the Association

In order to verify the right of representation, the Service Provider also processes the personal data of the senior officials of the legal entity members of the Association that are necessary for identification as follows:

A	B	C	D	E
Category of the data	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data storage,



processed				time of deletion
Name, mother's name, Home address, Tax number	The member concerned	Verification of authorization for representation, identification	GDPR Art. 6. § (1) Section f): Legitimate interest	Until the termination of the member status

Indication of legitimate interest:

- a) **Verification of the right of representation, identification:** The Service Provider, as Association, checks whether the person authorized to exercise the right of representation is the one to act on behalf of the member at the time of the establishment of the membership status and thereafter, when exercising membership rights related to the membership status. To this end, the Service Provider processes the personal data of the senior official of the legal entity member, which are necessary for identification and control. Without data processing, it would not be possible to ensure and verify whether it is indeed the authorized person acting on behalf of the legal entity member, therefore the purpose of data processing could not be achieved in any other way.

**The senior official of the member may object separately to the data processing based on a legitimate interest, in which case the Service Provider shall not further process the data of the senior executive unless he proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests of the data subject, rights and freedoms or they are relating to the submission, exercise or defense of legal claims.**

#### 6.9. Data processing related to donors who are sponsoring the Association

For compliance with tax and other obligations, as well as for the other purpose indicated below, the Service Provider Association processes the following data of the donors who sponsor it:

A	B	C	D	E
Category of the data processed	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data storage, time of deletion
Name	The member concerned	a) Enforcement of claims and rights b) Information about the activities of the association, communication and contact with	For purpose C / a): GDPR Art 6 § (1) Section (f): legitimate interest of the association	Duration of data processing for information and communication purposes: until consent is revoked.

		<p>the members</p> <p>c) Compliance with tax, social security and other legal reporting, declaration, registration and other obligations related to the donation</p>	<p>For purpose C / b): GDPR Art 6 § (1) Section (a): consent</p> <p>For the purpose C / c): GDPR Article 6 §(1) Section c): compliance with the legal obligation governing the Association — in the case of data necessary for compliance with tax obligation, 78. §(3), 202 § (1) of Act CL of 2017 („Ar.“) on taxation, while in the case of documents required for compliance with an accounting obligation, Section 168-169 of Act C of 2000 on Accounting (“the Act”).</p>	<p>The documents required for the fulfillment of a tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid in the absence of the declaration, data declaration or notification.</p> <p>The documents required to fulfill the accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and enforcement purposes, the data will be kept for 5 years from the date of donation.</p>
Home address	The member concerned	<p>a) Enforcement of claims and rights</p> <p>b) Information about the activities of the association, communication and contact with the members</p> <p>c) Compliance with tax, social security and other legal reporting, declaration, registration and other obligations related to the donation</p>	<p>For purpose C / a): GDPR Art 6 § (1) Section (f): legitimate interest of the association</p> <p>For purpose C / b): GDPR Art 6 § (1) Section (a): consent</p> <p>For the purpose C / c): GDPR Article 6 §(1) Section c): compliance with the legal</p>	<p>Duration of data processing for information and communication purposes: until consent is revoked.</p> <p>The documents required for the fulfillment of a tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have</p>

			<p>obligation governing the Association —</p> <p>in the case of data necessary for compliance with tax obligation, 78. §(3), 202 § (1) of Act CL of 2017 („Ar.“) on taxation, while in the case of documents required for compliance with an accounting obligation, Section 168-169 of Act C of 2000 on Accounting (“the Act”).</p>	<p>been paid in the absence of the declaration, data declaration or notification.</p> <p>The documents required to fulfill the accounting obligation will be kept for 8 years from the termination of the contract.</p> <p>In the case of data processing for claim and enforcement purposes, the data will be kept for 5 years from the date of donation.</p>
Tax number	The member concerned	Compliance with tax, social security and other legal reporting, declaration, registration and other obligations related to the donation	<p>GDPR Article 6 (1) point c): compliance with the legal obligation governing the Association -</p> <p>in the case of data necessary for compliance with tax obligations, § 78 (3), § 202 (1) of Act (“Art.”) CL of 2017 on taxation, while in the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting (“Sztv.”).</p>	<p>The documents required for the fulfillment of a tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid in the absence of the declaration, data declaration or notification.</p> <p>The documents required to fulfill the accounting obligation will be kept for 8 years from the termination of the contract.</p>
E-mail address	The member	Information about the activities of the association, communication and	GDPR Art. 6 §(1) Section a): Consent	Duration of data processing for information and communication



	concerned	contact with the members		purposes: until consent is revoked.
Amount of support/donation	The member concerned	Compliance with tax, social security and other legal reporting, declaration, registration and other obligations related to the donation	<p>GDPR Article 6 (1) point c): compliance with the legal obligation governing the Association -</p> <p>in the case of data necessary for compliance with tax obligations, § 78 (3), § 202 (1) of Act ("Art.") CL of 2017 on taxation, while in the case of documents required for compliance with an accounting obligation, § 168-169 of Act C of 2000 on Accounting ("Sztv").</p>	<p>The documents required for the fulfillment of a tax obligation shall be kept for 5 years from the last day of the calendar year in which the tax return, data declaration, notification should have been made, or the tax should have been paid in the absence of the declaration, data declaration or notification.</p> <p>The documents required to fulfill the accounting obligation will be kept for 8 years from the termination of the contract.</p>

**The data subject is free to withdraw his / her consent at any time, taking into account the above restrictions, by sending a message to the contact details of the Service Provider below.**

Indication of legitimate interest:

- a) **Enforcement of claims and rights:** The Service Provider handles these data so that in the event of a legal dispute or claim against the donor, a dispute arises with the donor regarding this data or the data indicated above, the Service Provider may use this data for evidentiary purposes. The Service Provider has this right under the Civil Code. within the general limitation period of 5 years Data management is therefore necessary in order to protect the rights and legitimate interests of the Service Provider. The purpose of data management cannot be achieved otherwise.



The sponsor / donor may object separately to the data management based on a legitimate interest, in which case the Service Provider shall not further process the data of the sponsor / donor, unless he proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests of the data subject's rights and freedoms or it is related to the submission, exercise or defense of legal claims.

#### 6.10. Data procession related to the senior officials of the association

The Service Provider Association is obliged to process the data of its own senior officials on the basis of the legislation applicable to the Association. The Service Provider processes the following personal data of the senior officials:

A	B	C	D	E
Category of the data processed	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data storage, time of deletion
Name	The person concerned	Compliance with legal obligation, registering the Association, certification of the right of representation	GDPR Article 6 § (1) Section c): the Association. §3:22. §, 3:26. Par. (2); §10 (1) Section e) and f) and Section a) of § (5) of the Civil Code.	As long as the Association exists.
Mother's name	The person concerned	Compliance with legal obligation, registering the Association, certification of the right of representation	GDPR Article 6 § (1) Section c): the Association. §3:22. §, 3:26. Par. (2); §10 (1) Section e) and f) and Section a) of § (5) of the Civil Code.	As long as the Association exists.
Home address	The person concerned	Compliance with legal obligation, registering the Association, certification of the right of representation	GDPR Article 6 § (1) Section c): the Association. §3:22. §, 3:26. Par. (2); §10 (1) Section e) and f) and Section a) of § (5) of the Civil Code.	As long as the Association exists.
Date of birth	The person concerned	Compliance with legal obligation, registering the Association, certification of the right of representation	GDPR Article 6 § (1) Section c): the Association. §3:22. §, 3:26. Par. (2); §10 (1) Section e) and f) and Section a) of § (5) of the Civil Code.	As long as the Association exists.
Tax number	The person	Compliance with legal obligation,	GDPR Article 6 § (1) Section c): the	As long as the Association exists.



	concerned	registering the Association, certification of the right of representation	Association. §3:22. §, 3:26. Par. (2); §10 (1) Section e) and f) and Section a) of § (5) of the Civil Code.	
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### 6.11. Data processed during the automatic data collection related to the Website

We use cookies and various other programs on the Website in order to get to know the needs of the Website Users, their behavior in relation to the Website and to further develop the Website based on the data, and to compile anonymous statistics on the Website visits. Some small programs help Users not have to re-enter their credentials the next time they log in and make it easier and faster to authenticate them, while other programs are used to authenticate Users.

The Service Provider classifies the cookies used by the Service Provider into three main groups:

a) **Cookies that are absolutely necessary for the operation of the Websites:** without them, the Websites do not work at all or not as intended, these cookies are necessary for the operation of the Websites. Such cookies only apply to operations such as language, currency, login, and privacy preferences. If these cookies are blocked by the User in his / her browser, the Websites will not work properly.

The Service Provider manages the cookies strictly necessary for the operation of the Websites on the basis of a legitimate interest in accordance with Article 6 (1) (f) of the GDPR.

In the case of data processing based on a legitimate interest, the data subject may object to the data processing at any time, in which case their data will no longer be processed by the Service Provider.

b) **Cookies for analytical and statistical purposes:** these cookies allow the Service Provider to measure visitor traffic and process data in databases. They also help the Service Provider understand which products and activities are more popular than others. These cookies can be blocked by the User in his browser or used at <https://tools.google.com/dlpage/gaoptout>. The Service Provider uses the data collected by these cookies to optimize the Website and to further develop the Website and its services.

The Service Provider manages these cookies on the basis of consent pursuant to Article 6 (1) a) of the GDPR.



**In the case of consent-based data processing, the data subject may withdraw his or her consent in the browser settings at any time, in which case the Service Provider will not use the given cookie and will no longer perform data collection or data processing with it.**

**c) Marketing and Remarketing Cookies:** These cookies are usually set for marketing, advertising and promotional activities in order to monitor Users' interests and then be able to display relevant ads on the Website accordingly. If the User does not enable these cookies, he will not receive targeted ads in the future. The purpose of processing the data collected using these cookies is to segment for direct business acquisition purposes to publish targeted advertisements. In addition, in order for Users to receive only advertisements that are relevant to their interests and that are relevant to them, we use the automatically collected data to segment Users and ads recipients into groups.

We do not make decisions based on automatically collected data, we do not link them to data we process about those involved in our activities, we do not use them in other contexts, and we do not make automated decisions based on them. The above data management has no legal effect on the data subjects.

The Service Provider manages these cookies on the basis of consent pursuant to Article 6 (1) a) of the GDPR.

**In the case of consent-based data management, the data subject may withdraw his or her consent in the browser settings at any time, in which case the Service Provider will not use the given cookie and will no longer collect or process data with it.**

#### **General provisions for cookies**

Generally speaking, a cookie is a small file made up of letters and numbers that is sent to a User's device from our server. The cookie enables the recognition of when the User last logged in to the Website. The main purpose of the cookie is to allow the User to make personalized offers and advertisements available to the User, which personalizes the User's experience who is using the Website and expresses the personal needs of the User.

Trusted partners help the Service Provider to display advertisements on and off the Website, and analytics providers such as Google Analytics may place cookies on the User's device.

The Service Provider uses the following third-party cookies for the following purposes:





Name of the cookie	Purpose of the cookie
Google Analytics	Generating statistics on website visits, developing the website
Google Adwords Remarketing	Use of ads services provided by Google LLC, featuring segmented ads

We use Google Analytics services and cookies on the Websites, as follows:

Google Analytics is a Google LLC (“Google”) Internet analytics service that helps the Service Provider learn more about the habits of visitors to the Websites. Google Analytics summarizes information about website usage, such as the IP address, which can be sent to Google and stored on servers. We use this information to generate reports and improve the operation of our website. Cookies also collect anonymous information about the number of visitors to the Website and information about which page visitors come to the Websites from and which pages they view.

**Learn more about Google Analytics cookies at <http://www.google.com/policies/privacy/>**

To turn off Google Analytics tracking when you visit Websites, click the link below: <http://tools.google.com/dlpage/gaoptout>

On our websites, the User may give his consent to cookies in groups according to their type.

We do not make decisions based on automatically collected data, we do not combine them with different other data we process in the course of our activities, we do not use them in other contexts, and we do not make automated decisions based on the data we get. Above data management has no legal effect on the data subjects.

The user can set his browser to accept all cookies, reject them all, or notify the user when a cookie arrives on the user's computer. Each browser is different, so the “Help” menu can help you change your cookie settings. For more information about the nature of cookies and how to turn them off, visit <http://www.youonlinechoices.com/en/>.

In order for the Service Provider to become aware that the user has blocked the use of certain cookies, the Service Provider places a blocking cookie on the user's device, so the Service Provider will know that it cannot place cookies the next time the User visits the Website.

For the most commonly used browsers, the menu items for handling cookies are:



Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Google Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Microsoft Edge: <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

Google Analytics offers additional options for unsubscribing from Google Analytics services: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>.

In case of ticket purchase for events on the Website, the automatically collected data are the following:

A	B	C	D	E
Category of the data processed	Source of data	Purpose of data processing	Legal basis of data processing	Duration of data storage, time of deletion
Automatically collected data: <ul style="list-style-type: none"> <li>▪ IP address</li> <li>▪ type of browser</li> <li>▪ type, language, version number and other settings of the operation system</li> <li>▪ seat selected when purchasing the ticket</li> <li>▪ data relating to the virtual cart (e.g. content of the cart)</li> <li>▪ page, sub-page, function or service visited</li> </ul>	Automatically collected	a) To recognise the user b) To customize the website c) To develop the website and the services one can access through it	GDPR Art. 6 §(1) Section a): Consent	Until consent is revoked

The type of cookies used to buy tickets on the website:

NAME OF COOKIE	PURPOSE OF COOKIE	DURATION OF DATA STORAGE
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NAME OF COOKIE	PURPOSE OF COOKIE	DURATION OF DATA STORAGE
PHPSESSID	Once logged in, it helps with the workflow done on the website, so it is necessary for the website to work.	Stored until leaving the website
tc_cart_seats	When purchasing a ticket, it notes the seat selection.	Stored up to 2 days
woocommerce_cart_hash	This cookie stores information about the goods placed in the virtual basket. The cookie does not store personal information.	Stored up to 2 days
woocommerce_items_in_cart	It stores the data that a visitor has put something in their virtual cart. This cookie does not store personal information.	Stored up to 2 days
wp_woocommerce_session_	This cookie gives each customer a unique number so the website knows where in the database to find the details of each customer's cart. This cookie does not store personal information.	Stored up to 2 days

**Cookies that are absolutely necessary for the operation of the Website:** there are no such cookies on the Website.

**Cookies for statistical and analytical purposes:**

NAME OF COOKIE	PURPOSE OF COOKIE, SCOPE OF COLLECTED DATA	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
_ga	Purpose: To identify and track a user on the Website by	2 years from setup / update	Google Analytics



NAME OF COOKIE	PURPOSE OF COOKIE, SCOPE OF COLLECTED DATA	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
_gid	<p>storing the so-called Client ID, to generate anonymous traffic statistics. They collect data for Google Analytics about a user's device, browsing habits and location.</p> <p>Scope of data collected: anonymized data, location, operating system, time spent on the website, subpages visited within the website.</p>	24 hours from setup / update	Google Analytics
_utma	<p>Purpose: To identify and track a user on the Website by storing the so-called Client ID, to generate anonymous traffic statistics. It collects data for Google Analytics about a user's device, browsing habits and location. This cookie provides information about whether you have previously visited the Website. This allows us to determine more precisely who the new visitors to the Websites are.</p> <p>Scope of data collected: number of page visits, date of first and last visit.</p>	2 years from setup / update	Google Analytics



NAME OF COOKIE	PURPOSE OF COOKIE, SCOPE OF COLLECTED DATA	DURATION OF DATA PROCESSING	OWN OR THIRD PARTY COOKIES
_utmb	<p>Purpose: Together with the _utmc cookie, the average time spent on the Websites can be determined with this cookie.</p> <p>Scope of data collected: date of access to the website</p>	Deletes automatically with closing the browser	Google Analytics
_utmc	<p>Purpose: Together with the _utmb cookie, the average length of time spent on the Websites can be determined with this cookie.</p> <p>Scope of data collected: time of exit from the website The _utmb cookie shows the time when the browser was closed.</p>	30 minutes from setup / update	Google Analytics
_utmt	Used to control the fetch rate	10 minutes	Google Analytics
_utmz	<p>Purpose: This cookie tracks where the visitor clicked on the Websites from (e.g. from another website or search engine).</p> <p>Scope of data collected: website visit source page, search term, country of origin, language settings, computer, device and browser technical settings.</p>	6 months from setup / update	Google Analytics

**Cookies for marketing and remarketing purposes:** there are no cookies for this purpose on the Websites.



## 7. The Data Controller

The controller of the personal data indicated in Section 6:

### **Right to Health Public Benefit Association**

Head office: 1145 Budapest, Columbus u. 29. 1. em. 2.

Registration number: 01-02-0013246

Registration authority: Metropolitan Court

Tax number: 18003022-1-42

Represented by: Dr. Gábor Béla Lenkei, President

Website: [www.jogazegeszseghez.hu](http://www.jogazegeszseghez.hu)

Tel.: +36 (20) 551 2066

E-mail address: [info@jogazegeszseghez.hu](mailto:info@jogazegeszseghez.hu)

## 8. Data processors

To process and store your data, we use various companies with whom we have concluded a data processing contract. The following data processors process your data:

Name of data processor	Data processing activity carried out	Those involved in data processing	Scope of data involved in data processing
Dr. Lenkei Admin Kft. CG. 01-09-340457; head office: 1085 Budapest, József Körút 8. 3. em. 2.;	Accounting	Association members (regular, patron and honorary), donors	Name Mother's name



represented by: Dr. Lenkei Gábor Béla			Home address Date of birth ID number Mailing address Tax number E-mail address Phone number Amount of donation
		Donors, patrons	Name Home address E-mail address Tax number Amount of support/donation
		Senior officers of legal entity members	Name Mother's name Home address Tax number
		Senior officers of the Association	Name Mother's name Home address Date of birth Tax number
<b>AD DESIGN SOLUTIONS Kft.</b> Cg. 09-09-019566; head office: 4031 Debrecen, Kishegyesi út 40. 5. em. 40.; adószám: 22918077-2-09; represented by: Takács Anita ügyvezető	Online marketing services, website operation	Website visitors	Data collected about those visiting the website
	MailChimp newsletter	Recipients of the newsletter	Name



<b>The Rocket Science Group LLC d/b/a MailChimp</b> Georgia 675 Ponce De Leon Ave NE, Suite 5000; Atlanta, Georgia 30308	sending system		E-mail address
<b>Imex Global Kft.</b> head office: 1188 Budapest, Nagykőrösi u. 23.; Tax number: 23583317-2-43; represented by: Nagy Gyula ügyvezető	System-administrator, IT services	Association members (regular, patron and honorary), donors	Name Mother's name Home address Date of birth ID number Mailing address Tax number E-mail address Phone number User name Password
		Contact persons of the legal entity members	Name Mailing address E-mail address Phone number
		Donors, patrons	Name Home address E-mail address Tax number Amount of support/donation
		Senior officers of legal entity members	Name Mother's name Home address Tax number
		Senior officers of the Association	Name





			Mother's name Home address Date of birth Tax number
		Persons filling in the „stay in touch“ form	Name E-mail address Personal data included in the message

**9. Who is the data protection officer of the Service Provider and what are his / her contact details?**

The Service Provider is not obliged to appoint a data protection officer.

**10. What are your rights regarding the processing of your personal data and how we ensure they are ensured?**

**10.1. Data protection rights and remedies**

The data protection rights of and remedies for data subjects are set out in detail in the relevant provisions of the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, Articles 80 and 82). The following summary contains the most important provisions, and the Data Controller accordingly provides information to the data subjects about their rights related to data processing and their legal remedies.

The information shall be provided in writing or by other means, including, where appropriate, by electronic means. Oral information may be provided at the request of the data subject, provided the identity of the data subject has been otherwise established.

The Data Controller shall, without undue delay, but in any case within one month of receipt of the request regarding the exercise of the right concerned (see Articles 15-22 GDPR), inform the data subject of the action taken upon his / her request. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The Company shall inform the data subject of the extension of the deadline,



indicating the reasons for the delay, within one month from the receipt of the request. If the data subject has submitted the request by electronic means, the information shall, as far as possible, be provided by electronic means, unless the data subject requests otherwise.

If the Data Controller does not take action on the data subject's request, without delay, but no later than within one month from the receipt of the request, the Data Controller shall inform the data subject of the reasons for non-action and that the data subject may file a complaint with a supervisory authority.

### **10.2. The data subject's right of access**

(1) The data subject has the right to receive feedback from the Data Controller as to whether the processing of his / her personal data is in progress. If such processing is in progress, the data subject shall have the right to access the personal data and the following information:

- a) the purposes of data management;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be communicated by the Company, including in particular third country recipients or international organizations;
- d) where applicable, the intended period for which the personal data will be stored or, if that is not possible, the criteria for determining that period;
- e) the data subject's right to request the Company to rectify, delete or restrict the processing of personal data concerning him or her and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority; and
- g) if the data were not collected from the data subject, all available information on their source.

(2) If personal data are transferred to a third country, the data subject is entitled to be informed of the appropriate guarantees for the transfer.

(3) The Data Controller shall provide the data subject with a copy of the personal data that is the subject of the data processing. The Data Controller may charge a reasonable fee based on administrative costs for additional copies requested by the data subject. If the data subject has submitted the request electronically, the information shall be provided in a widely used electronic format, unless the data subject requests otherwise.

### **10.3. Right to rectification**



The data subject has the right to correct inaccurate personal data concerning him / her at the request of the Data Controller without undue delay. The data subject is also entitled to request that the incomplete personal data be completed, inter alia, by means of a supplementary declaration.

#### **10.4. Right of cancellation ("right to forget")**

The data subject shall have the right, at the request of the Data Controller, to delete personal data concerning him or her without undue delay if one of the following reasons exists:

- a) personal data is no longer required for the purpose for which it was collected or otherwise processed by the Company;
- b) the data subject withdraws his or her consent on which the processing is based and there is no other legal basis for the processing;
- c) the data subject objects to the processing and, where applicable, there is no overriding legitimate reason for the processing;
- d) personal data have been unlawfully processed;
- e) personal data must be deleted for compliance with a legal obligation under EU or Member State law applicable to the Company; or
- f) personal data was collected in connection with the provision of information society services.

(2) If the Data Controller has disclosed personal data and is required to delete it as described above, he shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the data controllers that the data subject has requested deletion of links to the personal data in question or of a copy or duplicate of such personal data.

(3) Paragraphs 1 and 2 shall not apply where processing is necessary, inter alia:

- a) for the purpose of exercising the right to freedom of expression and information;
- b) for the purpose of complying with an obligation under EU or Member State law governing the processing of personal data applicable to the Company;
- c) for the purposes of archiving in the public interest, for scientific and historical research purposes or for statistical purposes, where the right referred to in paragraph 1 is likely to make such processing impossible or would seriously jeopardize it; or
- d) to file, enforce or defend legal claims.

#### **10.5. Right to restrict data processing**



(1) The data subject has the right to restrict the data processing at the request of the Data Controller if any of the following is met:

- a) the data subject disputes the accuracy of the personal data, in which case the restriction applies to the period of time that allows the Company to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the deletion of the data and instead requests that their use be restricted;
- c) the Data Controller no longer needs the personal data for the purpose of data processing, but the data subject requests them in order to submit, enforce or protect legal claims;
- d) the data subject has objected to the processing; in this case, the restriction shall apply for the period until it is determined whether the legitimate reasons of the Data Controller take precedence over the legitimate reasons of the data subject.

(2) Where processing is restricted pursuant to paragraph 1, such personal data, with the exception of storage, shall be subject to the consent of the data subject or to important public interest of the Member State.

(3) The Data Controller shall inform the data subject in advance of the lifting of the restriction of data processing, at whose request he / she has restricted the data processing on the basis of the above.

#### **10.6. Obligation to notify in connection with the rectification or erasure of personal data or restrictions on data processing**

The Data Controller shall inform all recipients to whom or with whom the personal data have been communicated of any rectification, erasure or restriction of data processing, unless this proves impossible or requires a disproportionate effort. Upon request, the Data Controller shall inform the data subject of these recipients.

#### **10.7. The right to data portability**

The data subject shall have the right to receive the personal data concerning him / her made available to the Data Controller in a structured, widely used machine-readable format and to transfer such data to another data controller without the Data Controller impeding it if:

- a) data management is based on consent or contract; and



b) data management is automated.

2. When exercising the right to data portability under paragraph 1, the data subject shall have the right, if technically feasible, to request the direct transfer of personal data between data controllers (such as Data Controllers and other data controllers).

3. The exercise of the right described above shall not injure the provisions relating to the right of cancellation ("right to be forgotten") and shall not adversely affect the rights and freedoms of others.

#### **10.8. The right to object**

The data subject has the right to object at any time, for reasons related to his or her situation, to the processing of his or her personal data based on legitimate interest. In this case, the Data Controller shall not further process the personal data, unless he proves that the processing is justified by compelling legitimate reasons which take precedence over the interests, rights and freedoms of the data subject or which relate to the submission, enforcement or protection of legal claims.

Where personal data are processed for scientific and historical research or statistical purposes, the data subject shall have the right to object to the processing of personal data concerning him or her on grounds relating to his or her situation, unless such processing is necessary for the performance of a task carried out in the public interest.

#### **Right to complain to the supervisory authority**

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the member state of his or her habitual residence, place of work or suspected infringement, if the data subject considers that the processing of personal data concerning the data subject infringes the GDPR. Competent supervisory authority in Hungary: National Data Protection and Freedom of Information Authority (website: <http://naih.hu/>; address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c; postal address: 1530 Budapest, Pf. : 5 .; phone: +36 -1-391-1400, fax: + 36-1-391-1410, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

#### **10.9. Right to an effective judicial remedy against the supervisory authority**



- (1) The data subject shall have the right to an effective judicial remedy against a legally binding decision of the supervisory authority on the data subject.
- (2) The data subject shall have the right to an effective judicial remedy if the competent 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.
- (3) Proceedings against the supervisory authority shall be brought before a court of the member state in which the supervisory authority has its seat.

#### **10. 10. The right to an effective judicial remedy against the Company or the data processor**

- (1) Without injuria to any available administrative or non-judicial remedies, including the right to complain to the supervisory authority, the data subject shall have an effective judicial remedy if he considers that his personal data rights have been violated under the GDPR as a result of improper handling of his personal data.
- (2) Proceedings against the controller or the processor shall be brought before the courts of the Member State in which the controller or the processor is established. Such proceedings may also be brought before a court of the Member State in which the person concerned has his habitual residence. Such a lawsuit falls within the jurisdiction of the tribunal in Hungary. The person concerned may also, at his choice, bring an action before a court having jurisdiction over his place of residence or commorancy. You can find out about the jurisdiction and contact details of the court (tribunal) on the following website: [www.birosag.hu](http://www.birosag.hu).

#### **11. How do we ensure the security of your data?**

The contributors involved in the data management and / or data processing of our company are entitled to get acquainted with personal data to a predetermined extent, subject to the obligation of confidentiality.

We protect personal data through appropriate technical and other measures, as well as ensure the security and availability of the data, and protect it from unauthorized access, alteration, damage or disclosure and any other unauthorized use.

As part of organizational measures, we control physical access in our buildings, continuously train our employees and keep paper-based documents locked with adequate protection. As part of the technical measures, we use encryption, password protection and anti-virus software. Our Company makes every effort to make the processes as secure as possible, and we adhere to strict regulations regarding the data received by our Company in order to ensure data security and prevent unauthorized access.



### **Data security in the IT infrastructure**

- We have internal policies for the data security of the IT infrastructure that are detailed and include all relevant details, including data security and information security requirements.
- We store personal information on leased servers located with a reliable server provider. Strict security procedures ensure that unauthorized persons cannot physically access the system.
- The data storage was located in lockable, air-conditioned rooms.
- To minimize data loss, we regularly back up our data.
- Access to the servers on the internal IT network is possible only after authentication with a username and password. We test and verify our IT systems from time to time, recurring and regularly, to establish and maintain data and IT security.
- The use of network resources for users is regulated, limited, subject to authentication.
- Even office workstations can only be accessed with the correct username and password. The use of foreign media is only possible after automatic virus and malware filtering.
- We continuously protect all of the Company's systems and system components against malicious software.
- In the design, development, testing, and operation of programs, applications, and devices, security functions are given priority and separation.
- The access keys of the information system (eg passwords) are stored encrypted, and the data concerning the security of the system (eg passwords, permissions, logs) are protected when allocating access rights.

### **Data security in communication**

- In the case of our mail system, a multi-stage protection system has been developed on both the client and server side. Anonymous access to the system is not allowed. It is only possible to send an electronic message to a clearly identified person.
- When receiving an electronic message, we use a mail filter system and our system examines the origin and identity of the sender.
- The protection we use detects the occurrence of unauthorized intrusion, modification, and intrusion. Data prevention and repair procedures are used to prevent data loss and damage and to ensure non-repudiation.
- In the case of the network used for data transmission, we ensure the prevention of illegal connection and eavesdropping in a manner appropriate to the level of security.
- Connecting to our network remotely requires multi-level authentication.
- Connection to the on-site wireless network is only possible for a strictly regulated device with an authentication key that has already been identified in our system.



### **Data security during records management**

- Even during document handling we comply with data security requirements which we set out in the records. Records are handled in accordance with the authorization levels specified in writing, in accordance with the security regulations applied to the confidentiality of each record. We have detailed and strict rules for the destruction, storage and release of documents.

### **Physical data security**

- In order to create physical data security, we ensure the proper closing and protection of our doors and windows, and we apply strict visitation and entry regulations for visitors.
- Paper-based documents containing personal data are placed in a locked cabinet that can only be accessed by a specific set of staff with proper authorization.
- The storage rooms are designed to provide sufficient security against unauthorized or violent intrusion, fire or natural disaster. The data carriers used for data transfer, backup and archiving can only be stored in a securely closed place.

### **12. What do we do if we have a privacy incident?**

In accordance with the law, we report the data protection incident to the supervisory authority within 72 hours of becoming aware of it, and we also keep a record of the data protection incidents. In cases specified by law, we also inform the users concerned.

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