

PRIVACY NOTICE

for the visitors of the website of HEPA Magyar Exportfejlesztési Ügynökség Nonprofit Zrt.

(www.hepa.hu)

and for the users of its services.

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ('General Data Protection Regulation' or 'GDPR'), the controller provides the following information to the Data Subjects about the processing of their personal data.

1. Name and contact details of the controller and its Data Protection Officer

The controller's data:

HEPA Magyar Exportfejlesztési Ügynökség Nonprofit Zrt. (HEPA Hungarian Export Promotion Agency Non-profit Private Company Limited by Shares)

(1027 Budapest, Kacsá u. 15-23., Hungary; e-mail address: info@hepa.hu; telephone: +36 1 922-2600)

(hereinafter: '**Controller**')

Data Protection Officer:

Name: dr. András György Szilágyi

Postal address: 1027 Budapest, Kacsá u. 15-23., Hungary

E-mail address: dpo@hepa.hu

Telephone: +36 1 922-2600

2. Definitions

'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

'controller': Controller means the natural or legal person or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;

'transfer' means making the personal data available to a specific recipient;

'personal data breach': a personal data breach means a breach of security relating to the processing of personal data that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

'identifiable natural person' means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online

identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

‘recipient’ means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not;

‘data concerning health’ means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

‘data subject’ means a Data Subject or natural person who is identified or identifiable based on any information;

‘consent of the data subject’ means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

‘third party’ means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

‘sensitive data’ means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

‘personal data’ means any information relating to the data subject.

3. The principles of data processing

The Controller follows the following principles during its processing activity:

- a) We process personal data lawfully, fairly and in a transparent manner.
- b) We only collect personal data for specified, explicit and legitimate purposes and do not process personal data in a manner that is incompatible with those purposes.
- c) The personal data we collect and process are adequate, relevant and limited to what is necessary for the purposes for which they are processed.
- d) We will take all reasonable steps to ensure that the data we process are accurate and, where necessary, kept up to date, and any personal data that are inaccurate will be erased or rectified without delay.
- e) Personal data are stored in a form which allows the identification of Data Subjects for no longer than is necessary to achieve the purposes for which the personal data are processed.
- f) We use appropriate technical and organisational measures to ensure the appropriate protection of personal data against unauthorised or unlawful processing, accidental loss, destruction or damage.

4. Information on automated decision-making and profiling:

No automated decision making or profiling will take place during the processing.

5. The scope of the personal data processed, and the purpose, legal basis and duration of the processing:

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
<p>Company registration on the website</p> <ul style="list-style-type: none"> - communication on business and professional matters - communication for marketing purposes - request for information - sending information leaflets and invitations to our events (exhibitions, functions, training etc.) 	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>telephone number e-mail surname of the chief executive first name of the chief executive position of the chief executive surname of the contact person first name of the contact person position of the contact person</p>	<p>until the company cancels its registration (or until the company's objection)</p>
<p>Newsletter</p> <p>its purpose is communication in connection with the public duties of the Controller and informing you about our news and upcoming events</p>	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>full name e-mail address</p>	<p>until you unsubscribe from the newsletter</p>

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
<p>Please note that when you subscribe to the company registration and newsletter services, we will act according to the following processing rules:</p> <p>Controllers:</p> <p>HEPA Magyar Exportfejlesztési Ügynökség Nonprofit Zártkörűen Működő Részvénytársaság (HEPA Hungarian Export Promotion Agency Non-profit Private Company Limited by Shares) Közép- Európai Gazdaságfejlesztési Nonprofit Kft. (Central European Economic Development Non-profit Ltd.) (company registration number: Cg.01-09-327932; tax number: 24733625-2-43) Ministry of Foreign Affairs and Trade</p> <p>By registering and by subscribing to the newsletter, you acknowledge the processing of the personal data provided in connection with the company registration and/or the newsletter service.</p>			
<p>Access control (paper-based)</p>	<p>The legitimate interests of the controller or a third party: Article 6(1)(f) of the General Data Protection Regulation</p>	<p>name company name date and time of arrival name of host</p>	<p>Until the right of access expires, but no later than three (3) months from the date on which the data is created</p>

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
Participants of training provided based on a licence	Compliance with a legal obligation: Article 6(1)(c) of the General Data Protection Regulation, having regard to the following law: Act LXXVII of 2013 on Adult Education	name name at birth mother's name place of birth date of birth position highest level of education educational identifier e-mail address billing name billing address postal address telephone number free-text personal data	Until 31 December of the 8 th year after the data were created
Participants of other professional programmes	The legitimate interests of the controller or a third party: Article 6(1)(f) of the General Data Protection Regulation	name position e-mail address billing name billing address postal address telephone number free-text personal data	At the end of the 5 th year after the end of the programme (general limitation period in civil matters)

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
Selection and assessment of trainers/speakers/ invited experts for training courses and other professional programmes	The processing is necessary for the performance of the contract between the Parties: Article 6(1)(b) of the General Data Protection Regulation	name name at birth name of company address of company postal address e-mail address telephone number highest level of education degree number name of the awarding institution relevant professional experience (years) relevant professional experience (proof) experience in adult education (years) experience in adult education (proof) language skills (no proof required)	At the end of the 5 th year after the termination of the contract (general limitation period in civil matters)
HEPA Export Academy Knowledge Centre e-learning registration	Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)	name name of company/university represented Neptun code e-mail address, country, city	Upon termination of employment in the case of employees, and upon withdrawal of consent or at the end of the 5 th year (general limitation period in civil matters) in the case of IKR users who are not employees
Complaint handling related to the services of the Export Academy	Compliance with a legal obligation: Article 6(1)(c) of the General Data	name address telephone number	At the end of the 3 rd year after the creation of the data

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
	Protection Regulation, having regard to the following law: Act CLV of 1997 on Consumer Protection	e-mail address free-text personal data	
Application for events related to support programmes	Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)	name position e-mail address telephone number mobile number address details	Unless otherwise requested, the processing will last until the completion of the professional review following the event or, if the data subject has consented to be notified by the Controller of its events on similar topics, until the withdrawal of that consent.

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
<p>Support programmes</p> <ul style="list-style-type: none"> - Registration of the application - Submission of the application - Evaluation of the application - On-site inspection - Handling of complaints/irregularities - Managing/tracking contracts 	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>name position e-mail address telephone number mobile number address details</p>	<p>After the funding decision, the data of unsuccessful applicants will be stored for a maximum of three years from registration.</p> <p>Otherwise, as specified in the call for applications</p> <p>At the end of the 5th year after the termination of the contract (general limitation period in civil matters)</p>

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
<p>Contributing to the implementation of support programmes</p> <ul style="list-style-type: none"> - Submission of the application - Evaluation of the application - Managing/tracking contracts 	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>name position e-mail address telephone number mobile number address details professional qualifications (proof) relevant professional experience (proof) language skills (proof)</p>	<p>To be determined individually, on a case-by-case basis. For example, in the case of European Union projects, until the end of the project's maintenance period, and in the case of domestically funded grants, for ten years from the date of approval of the beneficiary's report by the funding body pursuant to Section 101 of the Public Finances Implementing Decree.</p>
<p>Designing and implementing trade development programmes</p> <ul style="list-style-type: none"> - Submission of the application - Evaluation of the application - Managing/tracking contracts - On-site inspection - Handling of complaints/irregularities 	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>name position e-mail address telephone number mobile number address details identity card number</p>	<p>At the end of the 5th year after the termination of the contract (general limitation period in civil matters)</p>

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
Organising ceremonial events for support programmes	Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)	name position e-mail address telephone number mobile number address details	Until the end of the 5 th year after the event (general limitation period in civil matters)
Managing conflicts of interests employment relationship and employment-related relationship	The legitimate interests of the controller or a third party: Article 6(1)(f) of the General Data Protection Regulation	whether there is a legal relationship (yes/no) the type of the legal relationship name of employer/principal/client the nature of the legal relationship date of commencement of the legal relationship duration of the employment relationship or employment-related relationship the existence of membership (yes/no) the name and the activity of the company start of membership	For 3 years after the voluntary or involuntary termination of employment
Breach of integrity	The legitimate interests of the controller or a third party: Article 6(1)(f)	name of the notifier address of the notifier contact details of the notifier name of the representative of a legal person	If the notification turns out to be unfounded or no action needs to be taken, the Company will store the data for 60 days after closing the investigation; if the data is not necessary for the investigation, it

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
	of the General Data Protection Regulation	personal data included in the notification	will be deleted immediately; if any action is taken, the Company will store the data at the latest until the final conclusion of the proceedings initiated on the basis of the notification.
Outgoing invoices Incoming invoices	Compliance with a legal obligation: Article 6(1)(c) of the General Data Protection Regulation, having regard to the following law: Act C of 2000 on Accounting	name (the name of the undertaking too) address – postcode address – municipality address – street, house number address country tax number special tax status bank details	8 years after the relevant reporting period
(Agency) contracts entered into with private individuals	The processing is necessary for the performance of the contract between the Parties: Article 6(1)(b) of the General Data Protection Regulation	name mother's name date of birth place of birth address tax identification number social security number bank account number telephone number e-mail address	At the end of the 5 th year after the termination of the contract (general limitation period in civil matters)

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
<p>The Controller's performance of its public duties</p> <ul style="list-style-type: none"> - operating the trade development tools it has at its disposal - organising and conducting government and business delegations as well as professional events aimed at export promotion - managing business opportunities - managing cooperation with diplomatic missions and the network of partner offices - advisory and analytical/information services relating to grants and to specific countries and sectors 	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>name position e-mail address telephone number mobile number</p>	<p>At the end of the 5th year after the completion/performance of the task (general limitation period in civil matters)</p>
<p>Cooperation with governmental bodies, scientific and professional institutions, national, international and EU professional organisations and NGOs</p>	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>the data required for communication as stated in the agreement</p>	<p>According to an individual agreement</p>

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
<p>Professional events (sending delegations and receiving visiting delegations, bilateral or multilateral forums aimed at the development of economic relations, meetings, B2B events, business forums)</p> <p>The Controller will process only your name and the type of your food allergy to avoid serving you certain foods</p>	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p> <p>The explicit consent of the data subject in accordance with Article 9(2)(a) of the General Data Protection Regulation.</p>	<p>name date of birth (if applicable) mother's name (if applicable) position e-mail address telephone number mobile number address details nationality (if applicable) passport number (if applicable) identity card number (if applicable)</p> <p>food intolerances/food allergies</p>	<p>The processing will last until the end of the professional review following the event, but it cannot last longer than 5 years after closing the event (e.g. in the case of an obligation to submit a report about public duties).</p> <p>Immediately after the end of the event.</p>
<p>Organising the participation of Hungarian enterprises in fairs and exhibitions abroad</p>	<p>Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)</p>	<p>name of contact person telephone number e-mail address</p>	<p>Unless otherwise requested, the processing will last until the completion of the professional review following the event.</p>

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
Organising the participation of Hungarian enterprises in fairs and exhibitions abroad	Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)	name of participant position e-mail address mobile number nationality as necessary depending on the specific organisation task: - travel information (flight number, date of departure/arrival, airport of entry, travel insurance, hotel stay) - date and place of birth - travel and/or personal documents (such as passport or personal identification document number and data, and, if applicable, visa) - passport photo (necessary for requesting a photo pass) - home address	Unless otherwise requested, the processing will last until the completion of the professional review following the event or, if the data subject has consented to be notified by the Controller of its events on similar topics, until the withdrawal of that consent.
Performance of tasks assigned by the Ministry of Foreign Affairs and Trade	Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)	name position e-mail address telephone number mobile number address details	At the end of the 5 th year after the performance of the task (general limitation period in civil matters)

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
Organising a business meeting	Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)	name position e-mail address telephone number mobile number address details	At the end of the 5 th year after the end of the programme (general limitation period in civil matters)
Notification of press conference	Exercise of official authority: Article 6(1)(e) of the General Data Protection Regulation, having regard to the following law: Section 1(2) of Government Decree 163/2018 (IX. 10.)	name e-mail address telephone number	Processing will last until you unsubscribe from the newsletter.
Press reports and other reports about events	Consent of the data subject: Article 6(1)(a) of the General Data Protection Regulation	images (photos, videos, moving images) audio recordings	Until withdrawal of consent

Description of the activity and the purpose of the processing	Legal basis	Data processed	Duration or termination of processing
Recruitment (the relevant details can be found in a separate privacy notice)	Consent of the data subject: Article 6(1)(a) of the General Data Protection Regulation	name nationality date of birth place of birth mother's name social security number tax identification number identity card number address telephone number driving licence educational attainment e-mail address other data submitted voluntarily	Stored until you withdraw your consent or for one (1) year after the date of submission of the application.

6. The transfer of personal data, the recipients of personal data and the categories of recipients:

The Controller uses the following processors during the processing of the data.

NAME	ADDRESS	ACTIVITIES
New Land Media Reklám, Szolgáltató és Kereskedelmi Kft. (New Land Media Advertising, Service Provider and Trade Ltd) and Lounge Design Szolgáltató Kft. (Lounge Design Service Ltd)	1025 Budapest, Felső Zöldmáli út 72., Hungary	<i>measuring website traffic, producing reports</i>

Processors we use for our newsletter service:

NAME	ADDRESS	ACTIVITIES
New Land Media Reklám, Szolgáltató és Kereskedelmi Kft. (New Land Media Advertising, Service Provider and Trade Ltd) and Lounge Design Szolgáltató Kft. (Lounge Design Service Ltd)	1025 Budapest, Felső Zöldmáli út 72., Hungary	<i>database maintenance and processing, producing reports</i>

If we change our processors, we will indicate those changes in this notice.

The personal data will not be transferred to third countries (i.e. outside the EEA member states, and thus, outside the European Union) or to international organisations. Should the transfer of data still be necessary in the course of travel, the Controller will inform the data subject of this in advance, on a case-by-case basis.

The personal data will be transferred to the following recipients:

Recipient of the transfer	Time of the transfer	Subject of the transfer
Nemzetközi Testőr Biztonságsegélyszolgálati Kft. (International Bodyguard Security Service Ltd)	on a case-by-case basis	camera footage
MS Technika Kft. (MS Technika Ltd)	on a case-by-case basis	camera footage
Competent authority	on a case-by-case basis	to the extent necessary for the efficient management of the case concerned, depending on the competence of the authority
Pest County Government Office	training courses covered by the Adult Education Act	name, name at birth, place and date of birth, highest level of education, educational identifier, e-mail address

bEcommerce Kft. (bEcommerce Ltd)	Export Academy Knowledge Centre (registration on the e-Learning platform)	Neptun code, e-mail address, country, city
National Tax and Customs Administration	regular	at the request of the authorities
Auditor	regular	as required by law
Ministry of Foreign Affairs and Trade	regular	in accordance with the different tasks determined by the owner (e.g. data disclosure, reporting)
Regional partner office	on a case-by-case basis	
Counterterrorism Centre	on a case-by-case basis	name, date of birth (if applicable), mother's name (if applicable), position e-mail address, telephone number mobile number, address details, nationality (if applicable), passport number (if applicable), identity card number (if applicable)
Co-organisers of events	on a case-by-case basis	name, position, telephone number, mobile number, nationality

6 The rights of the data subject in relation to processing

Right of access

The Data Subject has the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed.

If the Data Subject's right of access under this section adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, the Controller may refuse to comply with the Data Subject's request to the extent necessary and proportionate.

If the Data Subject requests more than one copy of the above information, the Controller may charge a reasonable fee proportionate to the administrative costs of producing the additional copies.

If the Controller does not process the personal data indicated by the Data Subject, the Controller must also inform the Data Subject of this in writing.

Right to rectification and addition

The Data Subject has the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Data Subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

When exercising the right to rectification/addition, the Data Subject must specify the data that are inaccurate or incomplete and must also inform the Controller of the accurate and complete data. In justified cases, the Controller may request the Data Subject to provide the Controller with evidence of the accurate data in an appropriate manner, in particular by means of documents.

Without undue delay after the Data Subject's request for exercising his or her right to rectification has been complied with, the Controller will inform the persons to whom it has disclosed the Data Subject's personal data, provided that this is not impossible or does not involve a disproportionate effort on the part of the Controller. At the request of the Data Subject, the Controller will inform him or her of these recipients.

Right to data portability

The Data Subject has the right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the Controller.

The right to data portability may be exercised in respect of personal data which have been provided by the Data Subject to the Controller if

- a) the processing is based on the Data Subject's voluntary consent or on a contract to which the Data Subject is a party; and
- b) the processing is carried out by automated means.

If the Data Subject's right to data portability adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, the Controller may refuse to comply with the Data Subject's request to the extent necessary.

Any employer's actions taken in connection with data portability does not imply the erasure of the data, which will be kept by the Controller for as long as it has an appropriate purpose or legal basis for processing the data.

The erasure and restriction of personal data; right to object

Right to erasure

(1) The Data Subject has the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller must erase such personal data without undue delay where one of the following grounds applies:

- a) the personal data specified by the Data Subject are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the Controller has processed the personal data on the basis of the Data Subject's consent and the Data Subject withdraws his or her voluntary 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 for reasons relating to his or her particular situation or objects to the processing performed for direct marketing purposes, and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
- f) the personal data have been collected in connection with offering information society services directly to children.

(2) Where the Controller has made the personal data public and is obliged pursuant to paragraph (1) to erase the personal data, the Controller, taking account of available technology and the cost of implementation, will take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the Data Subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

(3) Paragraphs (1) and (2) will not apply where the processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- c) for reasons of public interest in the area of occupational health or public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

Restriction

(1) The Data Subject may obtain from the Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, in which case the restriction applies for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims;
- d) the Data Subject has objected to the processing on grounds relating to his or her particular situation; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Controller override those of the Data Subject.

(2) Where processing has been restricted under paragraph (1), such personal data may, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

(3) Data Subjects who have obtained restriction of processing pursuant to paragraph (1) will be informed by the Controller before the restriction of processing is lifted.

Objection

The Data Subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation if:

- processing is necessary for the performance of a task carried out in the exercise of official authority vested in the Controller or
- the purposes of the legitimate interests pursued by the Controller or a third party,
- including profiling based on the relevant provisions.

In such cases, the Controller may no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Enforcement possibilities for the Data Subject

In the case of access, erasure, rectification, restriction, objection or data porting, the Data Subject may submit his or her request to the Data Protection Officer.

Requests can be submitted in writing by e-mail or on paper. The Data Subject must specify in the request the personal data in respect of which he or she requests the Controller to take action.

The Controller must make a decision on the request submitted in writing within 1 month of its receipt. If necessary, taking into account the complexity of the request or the number of pending requests, the Controller may extend the time limit for making a decision on the request by an additional 2 months. The Data Subject must be informed of this extension and the reasons for it in advance.

If the Data Subject's request is justified, the Controller will implement the requested action within the procedural time limit, and it will inform the Data Subject in writing of its implementation. If the Controller rejects the Data Subject's request, it must make a written decision to that effect. In its decision, the Controller must state the facts on which the decision is based, as well as the reasons for the decision with reference to the relevant legislation and case law, and it must inform the Data Subject of the legal remedies available against the Controller's decision.

The Data Subject may only be required to pay the costs related to the exercise of the data subjects' rights only if the Controller has informed the Data Subject in writing within 8 days of receiving the request that the request is excessive, and at the same time it informed the Data Subject of the level of the administrative costs, but the Data Subject has maintained the request in writing despite these circumstances. The request is deemed to be maintained if the Data Subject does not withdraw it within 5 working days or by the administrative time limit, despite having been informed by the Employer.

A Data Subject who is liable for the costs must pay the costs separately, within 8 days of receiving the request for payment issued by the Controller.

If the Data Subject does not agree with the decision of the Controller or if the Controller fails to comply with the relevant procedural time limit set out above, the Data Subject may resort to the legal remedies provided for in section 7.

7 RIGHT TO LEGAL REMEDIES

The Data Subject may contact the Data Protection Officer of the Controller ([see](#) section 1) with any questions, objections or complaints related to the processing performed by the Controller.

In the event of a breach of data protection laws concerning the processing of his or her personal data, the Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information at the following contact details:

Name: National Authority for Data Protection and Freedom of Information
Postal address: 1363 Budapest, Pf. 9, Hungary
Address: 1055 Budapest, Falk Miksa utca 9-11., Hungary
Telephone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
Web: naih.hu
E-mail: ugyfelszolgalat@naih.hu

The Data Subject may also enforce his or her rights in court, in which case the legal proceedings will fall within the material jurisdiction of regional courts, and the Budapest-Capital Regional Court will have territorial jurisdiction in the case. The case can also be brought before the regional court of the permanent or temporary address of the Data Subject (the contact details of regional courts can be found at the following link: <http://birosag.hu/torvenyszekek>).

Furthermore, the Data Subject may engage for submitting the complaint, for conducting legal proceedings before the court and, if the law permits, for asserting his or her right to compensation on his or her behalf, a non-profit organisation or association established in accordance with Hungarian law, whose purposes specified in its articles of association are to serve the public interest and to protect the rights and freedoms of data subjects in relation to personal data.

Before turning to the supervisory authority or the court with your complaint, please contact the Controller (dpo@hepa.hu) to discuss and resolve the issue as quickly as possible.

8 Amendments to the Privacy Notice

The Controller reserves the right to amend this Privacy Notice, of which it will inform the Data Subjects in an appropriate manner. Information relating to processing is published on the www.hepa.hu website.

Budapest, 31 May 2022