

Privacy Policy

This Privacy Policy of Andrea Nárcisz Nagy, sole proprietor (address: 8000 Székesfehérvár, Torony sor 2. ground floor, door 2, Hungary; tax number: 55709819-1-27; registration number: 54425510; hereinafter referred to as the “Data Controller”) describes the characteristics of the data processing carried out on the website available at <https://www.angol-tanar.org/> (hereinafter referred to as the “Website”), including in particular the collection, storage, and use of data.

This Privacy Policy shall enter into force on 01 June 2026. The Data Controller shall make the Privacy Policy continuously available on its Website.

This Privacy Policy was prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: “**GDPR**”), with regard to the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: “**Info Act**”), with regard to the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (the Info Act); its conceptual framework corresponds to the definitions in Article 4 of the GDPR and in certain points to the interpretive provisions of Section 3 of the Info Act. For matters not defined in this Privacy Policy, the GDPR and, supplementarily, the Info Act shall apply.

The Data Controller is entitled to prepare an extract from this Privacy Policy for individual data processing operations, and may also ensure that data subjects declare by signing this document that they have read and acknowledged the extract. The Data Controller reserves the right to amend this Privacy Policy. If the amendment affects the use of personal data provided by the data subject, the Data Controller will inform the data subject in an appropriate manner, for example by e-mail. If the details of data processing also change as a result of an amendment to the Privacy Policy, the Data Controller will request separate consent from the data subject.

Please read the information below carefully and use the services available on the Website only if you agree with what is written below.

1. Principles relating to data processing

In providing its services, the Data Controller pays special attention to the protection of personal data, compliance with mandatory legal provisions, and secure and fair data processing. In accordance with Section 2 of this Privacy Policy, the Data Controller processes personal data confidentially, observing the principles of lawfulness, fairness, and transparency under the GDPR, processing data for specified purposes with due regard to data minimisation, adhering to the principle of storage limitation, protecting the confidentiality and integrity of personal data, and observing the principle of accuracy under the GDPR.

2. Manner and security of data processing

The Data Controller ensures the security of data and takes the technical and organisational measures and establishes the procedural rules necessary to enforce data and confidentiality protection rules prescribed by the GDPR, the Info Act, and other legislation. The Data Controller protects personal data against unauthorised access; alteration; transmission; disclosure; or accidental deletion, destruction; damage; and inaccessibility arising from changes in technology used.

The Data Controller places particular emphasis on protecting electronically processed data sets in various registers so that data stored in different registers cannot be directly linked or attributed to the data subject, unless permitted by law.

3. Data processing in connection with the Data Controller's Website

3.1. Contact

The Data Controller enables users visiting the website to contact the Data Controller via any of the contact details provided on the Website. In addition, a message can be sent directly to the Data Controller by filling in the form available on the Website. To send the message, the data subject must provide their name, e-mail address, and the message.

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| Purpose of data processing | Maintaining contact and communicating with clients. |
| Categories of data processed | The data subject's name, e-mail address, and the content of the message. |
| Categories of data subjects | Persons who contact the Data Controller. |
| Legal basis for data processing | The consent of the data subject pursuant to Article 6(1)(a) of the GDPR. |
| Data retention period | Until the purpose is fulfilled or the query is answered, but at most until deletion upon the data subject's request. |
| Manner of data processing | Electronically. |
| Source of data | Data collected from the data subject. |
| Possible consequences of failure to provide data | If the data subject does not provide the data to the Data Controller, they will not be able to contact the Data Controller. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the data? | The competent employees of the Data Controller and the employees of any data processors. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |

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| Data transfer | No data transfer to a third country or international organisation takes place. |
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3.2. Data processing related to registration

Visitors to the Website (as private individuals) may register on the Data Controller's Website.

More detailed information about registration can be found in the Data Controller's General Terms and Conditions, which are always available on the Data Controller's Website.

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| Purpose of data processing | Registration on the Website in connection with using the Data Controller's services, for the purpose of creating the associated user account. |
| Categories of data processed | The data subject's name, e-mail address, password, and phone number. |
| Categories of data subjects | Persons who wish to register on the Data Controller's Website. |
| Legal basis for data processing | The consent of the data subject pursuant to Article 6(1)(a) of the GDPR. |
| Data retention period | For up to 5 years following the deletion of the registration. |
| Manner of data processing | Electronically. |
| Source of data | Data collected from the data subject. |
| Possible consequences of failure to provide data | Provision of data is voluntary; if the data subject does not provide the data to the Data Controller, the data subject will not be able to register on the Data Controller's Website and therefore will not be able to create their user account. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the data? | The competent employees of the Data Controller and the employees of any data processors. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |
| Data transfer | No data transfer to a third country or international organisation takes place. |

3.3. Data processing related to user accounts

If the data subject registers on the Data Controller's Website, after successful registration they may log in to their user account by providing their e-mail address and password.

More detailed information about editing, modifying, and deleting the user account can be found in the Data Controller's General Terms and Conditions, which are always available on the Data Controller's Website.

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| Purpose of data processing | Management and storage of data related to the user account. |
| Categories of data processed | Data related to the user account, such as the data subject's e-mail address, password, name, phone number, and data relating to previous orders. |
| Categories of data subjects | Persons who register on the Data Controller's Website and create a user account. |
| Legal basis for data processing | The consent of the data subject pursuant to Article 6(1)(a) of the GDPR. |
| Data retention period | For up to 5 years following the deletion of the user account. |
| Manner of data processing | Electronically. |
| Source of data | Data collected from the data subject. |
| Possible consequences of failure to provide data | Provision of data is voluntary; the data subject may edit, modify, or delete the data provided at any time. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the data? | The competent employees of the Data Controller and the employees of any data processors. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |
| Data transfer | No data transfer to a third country or international organisation takes place. |

3.4. Data processing related to orders and purchases

If a visitor to the Website wishes to make a purchase on the Data Controller's website, they may do so with or without registration. Prior to placing an order for the selected product, i.e. before the conclusion of the contract between the buyer and the Data Controller, the buyer must provide certain data.

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| Purpose of data processing | Placing an order in the webshop available through the Data Controller's Website, maintaining a record of buyers, and fulfilling orders. |
| Categories of data | The data subject's name, e-mail address, phone number, billing |

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| processed | details, any message in the notes field, the date of purchase, the number and quantity of the ordered product, the purchase price, and the order number. |
| Categories of data subjects | Persons who make purchases in the Data Controller's webshop. |
| Legal basis for data processing | For optionally provided data, the consent of the data subject pursuant to Article 6(1)(a) of the GDPR; for other data, performance of the contract between the Data Controller and the data subject pursuant to Article 6(1)(b) of the GDPR. A <i>Accounting Act</i> (Act C of 2000), Sections 159 and 167, compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR. |
| Data retention period | Personal data processed on the basis of the data subject's consent shall be retained by the Data Controller until the consent is withdrawn, but for no longer than the 5-year limitation period, while other data related to the order shall be retained for up to 5 years following the deletion of the user account (or, in the case of a guest purchase, following the placement of the order). Accounting documents must be retained by the Data Controller pursuant to <i>Accounting Act</i> (Act C of 2000), Section 169(2), the Data Controller is required to retain accounting documents for at least 8 years. The Data Controller automatically deletes the data subject's personal data after 8+1 years. |
| Manner of data processing | Electronically and/or on paper. |
| Source of data | Data collected from the data subject. |
| Possible consequences of failure to provide data | Provision of certain personal data is necessary for the performance of the contract; if the data subject does not provide the data to the Data Controller, the Data Controller will not be able to perform the contract. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the data? | The competent employees of the Data Controller and the employees of any data processors. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |
| Data transfer | No data transfer to a third country or international organisation takes place. |

The Data Controller notes that it uses the services of Barion Payment Zrt. as a data processor for payment processing. The Data Controller does not receive any financial or bank card data from Barion or any third party that would enable it to charge the Applicant's bank account or payment account without the Applicant's involvement and prior authorisation, or to deduct any amount therefrom.

The Data Controller informs the Applicant that during the use of Barion, it does not access the password or validation code (CVV/CVC code) associated with the Applicant's bank card, bank account number, or payment account; these data always remain in a secure channel.

The Data Controller receives from the payment service providers the personal data specified in the Privacy Policy, the transfer of which is necessary for the Data Controller to fulfil its statutory obligations (such as the amount and date of payment), as well as data (which may in some cases be personal) that enable the Data Controller to notify the Applicant in the event of an error during a payment transaction (e.g. expired card, transaction timeout) in order to facilitate successful payment.

The Applicant also acknowledges that the following personal data stored by the Data Controller on the Website in its applicant database will be transferred to Barion Payment Zrt. as a data processor: data transferred by the Data Controller: e-mail address, amount of fee payment, frequency of fee payment. The nature and purpose of the data processing activity carried out by the data processor can be viewed in the Barion Payment Zrt. Privacy Policy at the following link: <https://www.barion.com/hu/adatvedelmi-tajekoztato/>

The Data Controller informs the Applicant that the processing of bank card data used for online payment is carried out in accordance with the terms set by the card-issuing company. Neither the Data Controller nor Barion Payment Zrt. has access to the full bank card data.

3.5. Invoicing

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| Purpose of data processing | Issuing, managing, and accounting for invoices. |
| Categories of data processed | A <i>Accounting Act</i> (Act C of 2000), Section 167, and az <i>Value Added Tax Act</i> (Act CXXVII of 2007) Section 169, including in particular the data subject's name, the date and period of the economic transaction, and address. |
| Categories of data subjects | Persons who place orders through the Data Controller's Website. |
| Legal basis for data processing | A <i>Accounting Act</i> (Act C of 2000), Sections 159 and 167, compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR. |
| Data retention period | Accounting documents must be retained by the Data Controller pursuant to <i>Accounting Act</i> (Act C of 2000), Section 169(2), the Data Controller is required to retain accounting documents for at least 8 years. The Data Controller automatically deletes the data subject's personal data after 8+1 years. |
| Manner of data processing | Electronically and/or on paper. |
| Source of data | Data collected from the data subject. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the | The personal data may be accessed by the competent employees |

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| personal data? | and data processors of the Data Controller. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |
| Data transfer | No data transfer to a third country or international organisation takes place. |

3.6. Complaint handling

Buyers who qualify as consumers are entitled to the right of complaint as defined in Act CLV of 1997 on Consumer Protection (hereinafter: “Consumer Protection Act”). Under the Consumer Protection Act, the consumer (data subject) may submit a complaint to the Data Controller by e-mail at andreanarcisznagy@gmail.com..., verbally at the phone number provided on the Website, or by letter sent to the postal address. Complaints received by the Data Controller are handled in accordance with the provisions of the Consumer Protection Act, and the consumer is informed of the outcome of the investigation within the specified deadline.

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| Purpose of data processing | Receiving, investigating, and handling complaints. |
| Categories of data processed | The data subject’s name, address, e-mail address (if the complaint was submitted by e-mail), and other data related to the complaint as specified in Section 17/A(5) of the Consumer Protection Act. |
| Categories of data subjects | The natural person qualifying as a consumer who submits the complaint. |
| Legal basis for data processing | Compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR, with regard to Section 17/A(5) of the Consumer Protection Act. |
| Data retention period | If the data subject raises no further objection after the response is sent, the Data Controller will delete the data 3 years after sending the response pursuant to Section 17/A(7) of the Consumer Protection Act. In the case of further claims, data will be deleted upon expiry of the limitation period, or, in the case of a civil law claim, upon the final conclusion of the related proceedings. |
| Manner of data processing | On paper and/or electronically. |
| Source of data | Data collected from the data subject. |
| Possible consequences of failure to provide data | Provision of personal data is mandatory; if the data subject does not provide the data to the Data Controller, the Data Controller will not be able to investigate the complaints. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the data? | The competent employees of the Data Controller and any legal representatives. |

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| Data transfer | No data transfer to a third country or international organisation takes place. |
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3.7. Data processing related to the newsletter

The Data Controller enables newsletter subscribers to receive additional information about its services at regular intervals via newsletters, and to unsubscribe at any time via the unsubscribe link available in the user account or at the bottom of the newsletter.

In connection with newsletter delivery, the Data Controller uses the services of www.angol-tanar.org.

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| Purpose of data processing | Effective informing of newsletter subscribers and dissemination of knowledge to them. |
| Categories of data processed | The e-mail address of the newsletter subscriber. |
| Categories of data subjects | Persons who subscribe to the newsletter. |
| Legal basis for data processing | The consent of the data subject pursuant to Article 6(1)(a) of the GDPR. |
| Data retention period | Until the data subject withdraws their consent. |
| Manner of data processing | Elektronikus |
| Source of data | Data collected from the data subject |
| Possible consequences of failure to provide data | If the data subject does not provide the data to the Data Controller, the Data Controller will not be able to send them a newsletter. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the personal data? | The competent employees of the Data Controller and the employees of any data processors. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |
| Data transfer | No data transfer to a third country or international organisation takes place. |

3.8. Data processing related to the Facebook page

Az Data Controller a <https://www.facebook.com/> website operates a Facebook page available at: <https://www.facebook.com/profile.php?id=61575112174075...>

The Data Controller's closed Facebook group:
<https://www.facebook.com/groups/967662832645395...>

The Closed Facebook Group becomes available to the data subject only after purchasing a product or course.

The Data Controller publishes information and informal news about its services and activities on its Facebook page. Applicants become entitled to join the Closed Facebook Group only after purchasing a Training within the framework of the Service, i.e. after purchasing a course. The Closed Facebook Group aims to provide active participation and live assistance to participants, facilitating the delivery of Training at a high professional standard and enabling Applicants to ask questions directly to the Service Provider. Applicants may ask for help if they get stuck and may request tips and ideas for any question or problem. Visitors to the page have the opportunity to share their opinions about the Data Controller's services. The Data Controller collects data and analyses visitor activity on its Facebook page using the Page Insights feature.

With regard to personal data collected during Page Insights related to the Facebook page, the Data Controller and Meta Platforms Ireland Ltd. are joint controllers pursuant to Article 26 of the GDPR, as they jointly determine the purposes and means of processing. For any other processing of personal data related to the Facebook page and associated content where the purposes and means are not jointly determined, Meta Platforms Ireland Ltd. and, depending on the circumstances, the Data Controller remain independent, separate controllers. The main obligations and responsibilities relating to joint processing between the Data Controller and Meta Platforms Ireland Ltd. are divided as follows. Meta Platforms Ireland Ltd. assumes primary responsibility under the GDPR for the processing of insights data and for complying with all relevant obligations under the GDPR in connection with such processing. Meta Platforms Ireland Ltd. informs data subjects about the processing via the "Information about Page Insights data" section on the Facebook page. Meta Platforms Ireland Ltd. designates the communication channels serving as contact points for data subjects.

Where data subjects exercise their rights against the Data Controller in connection with the processing of insights data, or where the supervisory authority contacts the Data Controller in connection with the processing of insights data, the Data Controller shall promptly, but within no more than 7 calendar days, forward all relevant data relating to such requests to Meta Platforms Ireland Ltd. Meta Platforms Ireland Ltd. undertakes to respond appropriately to data subjects' requests in fulfilment of its obligations. The Data Controller shall not act on behalf of, or provide responses in the name of, Meta Platforms Ireland Ltd.

The Data Controller ensures that it has an appropriate legal basis under the GDPR for the processing of insights data. The Data Controller does not request specific personal data processed during Page Insights from Meta Platforms Ireland Ltd.; the Data Controller only sees the statistics and reports prepared by Meta Platforms Ireland Ltd., not the underlying personal data.

Further information about the joint data processing agreement between the Data Controller and Meta Platforms Ireland Ltd. regarding the Facebook page can be found at:

https://www.facebook.com/legal/terms/information_about_page_insights_data

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| Purpose of data processing | Processing of data arising in connection with the use of the Facebook page. |
| Categories of data processed | As a general rule, the Data Controller only processes statistical data, such as: the number of persons who liked the page, the number of new likes, the number of persons who read, liked, commented on, or shared posts on the Facebook page, the number of spam flags, the number of page views, the number of visits from external pages or websites, the number of video views, and the most viewed videos. With regard to persons who like the Facebook page, the Data Controller also processes age, gender, and location as statistical data. |
| Categories of data subjects | Visitors to the Facebook page. |
| Legal basis for data processing | The consent of the data subject pursuant to Article 6(1)(a) of the GDPR. |
| Data retention period | Until the data subject withdraws their consent. |
| Manner of data processing | Electronically. |
| Source of data | Data collected from the data subject. |
| Who may access the personal data? | The competent employees of the Data Controller, employees of Meta Platforms Ireland Ltd., and employees of any data processors. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |
| Data transfer | No data transfer to a third country or international organisation takes place. |

3.9. Data processing related to enforcement of legal claims

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| Purpose of data processing | Enforcement of the Data Controller's legal claims related to contracts, including payment demands and contentious and non-contentious proceedings. |
| Categories of data processed | The Data Controller processes data and documents necessary for the enforcement of its rights, such as the name, place and date of birth, permanent address, notification address, mother's name, and contact details (phone number, e-mail) of the "debtor/obligor", the type and amount of the debt, documents related to the performance of the contract, and data and documents supporting the Data Controller's legal claims. |
| Categories of data subjects | The contractual partners and clients of the Data Controller. |

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| Legal basis for data processing | Article 6(1)(f) of the GDPR, i.e. the legitimate interest of the Data Controller. |
| Data retention period | The Data Controller retains processed data until the performance of the relevant contract, or until the fulfilment of rights and obligations arising therefrom; in other cases, a Accounting Act (Act C of 2000), Section 169(2), after 8+1 years, or after expiry of the limitation period under the Civil Code, or 5 years after a final decision, it deletes the data automatically. |
| Manner of data processing | On paper and/or electronically. |
| Source of data | Data collected from the data subject. |
| Who may access the personal data? | The competent employees and any legal representatives of the Data Controller may access the data. |
| Data transfer | No data transfer to a third country or international organisation takes place. |

3.10. Data processing related to maintaining records of the exercise of data subject rights under the GDPR

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| Purpose of data processing | Data processing related to maintaining records of the exercise of data subject rights as defined in the GDPR. |
| Categories of data processed | The name, place and date of birth, mother's name, permanent address, and correspondence address of the applicant, and the request to exercise a data subject right under the GDPR. |
| Categories of data subjects | A person exercising a data subject right under the GDPR. |
| Legal basis for data processing | The legal basis for the processing is compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR, and the legitimate interest pursuant to Article 6(1)(f). |
| Data retention period | Five years from the assessment of the request. |
| Manner of data processing | On paper and/or electronically. |
| Source of data | Data collected from the data subject. |
| Possible consequences of failure to provide data | If the data subject does not provide the data to the Data Controller, the Data Controller will not be able to assess the data subject's request. |
| Automated decision-making and profiling | The Data Controller does not apply automated decision-making and does not carry out profiling. |
| Who may access the personal data? | The competent employees of the Data Controller and the employees of any data processors. The current list of data processors of the Data Controller is contained in Section 4 of this Privacy Policy. |
| Data transfer | No data transfer to a third country or international organisation |

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3.11. Cookies

In operating the Website, the Data Controller uses so-called “cookies”. A cookie is a small data file (hereinafter: “cookie”) that the Data Controller sends to the data subject’s browser programme and which is stored on the data subject’s device. Some cookies are essential for the proper functioning of the website, others collect statistics to make use of the website more convenient, while some cookies are used for placing targeted advertisements.

The Data Controller’s current cookie policy can be found on the Data Controller’s Website.

4. Data Processors

Data processors do not make independent decisions and are only authorised to act in accordance with the contract concluded with the Data Controller and the instructions received. Data processors record, process, and handle personal data transmitted to them by the Data Controller in accordance with the GDPR. Data processors carry out data processing operations on personal data provided by data subjects within the usage periods specified in this Privacy Policy, in accordance with the respective data processing purposes. For the data processing activities described in this Privacy Policy, the Data Controller uses the following data processors:

| Category of Data Processor | Purpose of Data Processing | Data Processor | | |
|-----------------------------|----------------------------|---------------------|---|-------------------------------------|
| | | Name | Registered Address | Company reg. no. / registration no. |
| Hosting Provider | hosting service | | | |
| Invoicing Software | issuing invoices | | | |
| Payment Service | Payment Service | Barion Payment Zrt. | 1117 Budapest, Irinyi József utca 4-20. | 01-10-048552 |
| Newsletter Service Provider | sending newsletters | | | |

5. Enforcement of data subjects’ rights

The data subject may request information about the processing of their personal data; request rectification, restriction of processing, or deletion of their personal data directly from the Data Controller at the e-mail address andreanarcisznagy@gmail.com ...; and may exercise their right to data portability, the right to redress, and the right to withdraw consent. In the event of a complaint, the data subject may contact the National Authority for

Data Protection and Freedom of Information in Hungary or, at their choice, a court. In judicial proceedings, the regional court has jurisdiction.

When fulfilling a request relating to the processing of the data subject's personal data, the Data Controller carries out the identification of the data subject in accordance with this Privacy Policy, taking into account the data subject's status (client, applicant, etc.), and the Data Controller is only entitled to fulfil the data subject's request after completing the appropriate level of identification.

If the applicant does not submit their request relating to personal data processing in accordance with this Privacy Policy and the Data Controller is unable to carry out the appropriate identification of the applicant required for data security and/or confidentiality protection (as specified in this Privacy Policy), the Data Controller will call upon the applicant to remedy the deficiency; failure to do so will result in the Data Controller being unable to respond to the request.

The time elapsed between the Data Controller's request for the necessary personal data or missing action and the provision of the personal data shall not count towards the deadline for responding to the request.

The Data Controller informs every recipient to whom the personal data have been disclosed of any rectification, deletion, or restriction of processing, unless this proves impossible or involves disproportionate effort. Upon the data subject's request, the Data Controller shall inform the data subject of these recipients.

a) Right to information and access

In accordance with the obligation set out in Article 13 of the GDPR, the Data Controller is obliged – where personal data are collected from the data subject – to provide the data subjects with the following information at the time of collection:

- a) the identity and contact details of the data controller and its representative;
- b) the contact details of the data protection officer, where applicable;
- c) the purposes and legal basis of the intended processing of personal data;
- d) where applicable, the recipients or categories of recipients of the personal data;
- e) the period for which the personal data will be stored, or, if that is not possible, the criteria used to determine that period;
- f) information about the data subject's right to request access to, rectification, erasure, or restriction of processing of their personal data, and to object to the processing of such personal data, as well as the right to data portability;
- g) where processing is based on consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- h) the right to lodge a complaint with a supervisory authority;

- i) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and the possible consequences of failure to provide such data.

Where personal data have not been obtained from the data subject, the Data Controller shall provide the data subject with the above information and, in addition, pursuant to Article 14 of the GDPR, the following information:

- a) the categories of personal data concerned;
- b) the recipients or categories of recipients of the personal data, where applicable;
- c) the source of the personal data and, where applicable, whether it came from publicly accessible sources.

Where personal data have not been obtained from the data subject, the Data Controller shall provide the information:

- a) within a reasonable period after obtaining the personal data, but at the latest within one month;
- b) if the personal data are used for communication with the data subject, at the latest at the time of the first communication with the data subject; or
- c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

The above information obligation need not be fulfilled where:

- the data subject already has the information;
- the provision of such information proves impossible or would involve disproportionate effort;
- the obtaining or disclosure of the data is expressly laid down by EU or applicable Hungarian law applicable to the Data Controller, which provides for appropriate measures to protect the data subject's legitimate interests; or
- the personal data must remain confidential subject to an obligation of professional secrecy regulated by EU or applicable Hungarian law.

The data subject's right of access – in accordance with Article 15 of the GDPR – covers the provision of the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored;
- the data subject's rights in relation to the processing of personal data;
- the source of the data, where they were not collected from the data subject;

- information about automated decision-making.

The Data Controller always strives to ensure that the information provided to the data subject is, to the extent possible, concise, transparent, intelligible, easily accessible, clear, and plain, in addition to complying with the rules set out in the GDPR. The Data Controller is responsible for providing the information and taking action. The Data Controller provides all information to the data subject in writing, including electronically. Taking into account the data security rules set out in Articles 15 and 32 of the GDPR, the Data Controller provides information to the data subject only after verifying the data subject's identity. If identity verification does not take place, the Data Controller will reject the data subject's rights request and inform the data subject of the manner in which they may exercise their rights.

The Data Controller informs the data subject within one month of receiving a duly communicated request regarding their rights. Taking into account the complexity of the requests and the number of requests, this one-month period may be extended by a further two months by the Data Controller, with a reasoned notification sent to the data subject within one month of receipt of the request.

A communication or receipt is considered appropriate if the written request is sent by the data subject to the Data Controller's official address or the e-mail address designated for this purpose and duly arrives there.

The Data Controller will not take into account requests not communicated in the manner described above.

Information and communication relating to the processing of personal data must be easily accessible, intelligible, and formulated in clear and plain language. This principle applies in particular to informing data subjects of the identity of the data controller and the purposes of the processing, and to further information aimed at ensuring fair and transparent processing of the data subject's personal data, as well as information that data subjects have the right to obtain confirmation and information about the data processed about them.

The Data Controller provides the information and takes the measures described in this section free of charge; the Data Controller charges a fee only in the cases specified in Article 12(5) of the GDPR.

b) Right to rectification

The data subject has the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning them. 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.

c) Right to object

The data subject may object to the processing of their personal data by a declaration addressed to the Data Controller if the legal basis for the processing is

- a public interest pursuant to Article 6(1)(e) of the GDPR, or
- a legitimate interest pursuant to Article 6(1)(f) of the GDPR.

Upon the exercise of the right to object, the Data Controller may no longer process the personal data unless the Data 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. The management of the Data Controller shall decide whether the processing is justified by compelling legitimate grounds.

The data subject shall be informed of the Data Controller's position in this regard by means of an opinion. For the duration of the assessment, the personal data shall be appropriately restricted.

d) Right to restriction of processing

Restriction of processing may take place in the following cases:

- the data subject contests the accuracy of the data, in which case the Data Controller restricts the processing of personal data for a period enabling verification of the accuracy of the data;
- the processing is unlawful and the data subject opposes erasure and requests restriction of use instead;
- the Data Controller no longer needs the data but the data subject requires them for the establishment, exercise, or defence of legal claims;
- the data subject has objected to processing pursuant to Article 21 of the GDPR, pending verification of whether the legitimate grounds of the Data Controller override those of the data subject.

For the duration of the assessment of the data subject's objection to the processing of their personal data – but for no more than 5 days – the Data Controller suspends processing, examines the merits of the objection, and makes a decision, of which the applicant is informed.

If the objection is well-founded, the Data Controller restricts the data, meaning that only storage as a form of processing may take place until:

- the data subject consents to the processing;
- the processing is necessary for the establishment, exercise, or defence of legal claims;
- the processing is necessary for the protection of the rights of another natural or legal person; or
- the processing is ordered by law for reasons of important public interest.

Where the Data Controller lifts the restriction of processing, the data subject at whose request the restriction was imposed shall be informed in writing prior to the lifting of the restriction, unless this proves impossible or involves disproportionate effort. Where the restriction was requested by the data subject, the Data Controller shall inform the data subject in advance of the lifting of the restriction.

e) Right to erasure (“right to be forgotten”)

The data subject has the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay, and the Data Controller is obliged to erase personal data concerning the data subject without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and there is no other legal basis for the processing;
- c) the personal data have been unlawfully processed;
- d) the personal data must be erased for compliance with a legal obligation laid down in legal obligation laid down in EU or Hungarian law applicable to the Data Controller;
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- e) the personal data were collected in relation to the offer of information society services.

The data subject’s right to erasure may be restricted only where the following exceptions set out in the GDPR apply, i.e. the further retention of personal data may be considered lawful where:

- a) for the exercise of the right of freedom of expression and information; or
- b) for compliance with a legal obligation (i.e. for the duration appropriate to the purpose of the processing for activities recorded with a legal obligation basis in the Privacy Register); or
- c) for the performance of a task carried out in the public interest; or
- d) for the exercise of official authority vested in the Data Controller; or
- e) for reasons of public interest in the area of public health;
- f) for archiving purposes in the public interest; or
- g) for scientific or historical research purposes or statistical purposes; or
- h) for the establishment, exercise, or defence of legal claims.

f) Right to data portability

The data subject has the right to receive personal data concerning them that they have provided to the Data 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 to which the personal data have been provided, where:

- the processing is based on the data subject's consent or the processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract [GDPR Article 6(1)(a) or (b), or Article 9(2)(a)];
AND
- the processing is carried out by automated means.

This right does not apply where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller, or where it would adversely affect the rights and freedoms of others.

Where the Data Controller is required to provide personal data to a person other than the data subject under the data subject's right to data portability, the Data Controller shall inform and call upon that third-party recipient that the personal data transferred may not be used for their own purposes and may only be processed in accordance with applicable data protection legislation. The Data Controller accepts no liability for the use by a third party of personal data duly transmitted to that third party at the data subject's request.

g) Right to withdraw consent

Where the legal basis for the Data Controller's processing of the data subject's personal data is the data subject's consent, the data subject may withdraw their consent to the processing at any time. In this regard, the Data Controller informs data subjects that following the withdrawal of consent, the Data Controller may continue to process the data subject's personal data for the purpose of fulfilling a legal obligation or pursuing legitimate interests, provided that the pursuit of such interests is proportionate to the restriction of the right to protection of personal data.

6. Legal Remedies

The data subject has the right to contact the Data Controller directly, using the contact details specified in Section 1, in order to remedy any violation suffered or to submit any other complaint. If the data subject considers the data processing carried out by the Data Controller to be unlawful or harmful, they may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság – NAIH) (address: 1055 Budapest, Falk Miksa utca 9-11., mailing address: 1363 Budapest, P.O. Box 9., telephone: +36 (1) 391-1400, e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu). The data subject may also apply to a court for the protection of their personal data. Such proceedings shall be handled with priority. In this case, the data subject may choose to bring the action before the court competent for their place of residence (permanent address) or place of stay (temporary address)

(<http://birosag.hu/torvenyszekek>). Information on the court having jurisdiction based on the data subject's place of residence or stay is available at: <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.