

# **PRIVACY NOTICE**

**HUNGARIAN TENNIS ASSOCIATION  
(MAGYAR TENISZ SZÖVETSÉG)  
[www.huntennis.hu](http://www.huntennis.hu)**

**November 16, 2018**

Issued by:

The Hungarian Tennis Association (hereinafter referred to as HTA) is committed to protect data of the data subjects entering into relations with it, and to provide them adequate information on processing their respective personal data.

In our Privacy Notice, we explain that under Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: GDPR), as well as in cases not regulated by the GDPR, under Act CXII of 2011 on the Right of Informational Self-Determination and the Freedom of Information (hereinafter: Infotv.) and Act 1 of 2004 on Sports,

- on which grounds the Hungarian Tennis Association is entitled to the processing of personal data (legal basis),
- which personal data are processed,
- for which purposes personal data are processed (purpose of processing),
- the period for which personal data are processed (period of processing),
- whether or not we engage a data processor or transfer the personal data of the data subjects,
- who will have access to the personal data,
- what are the rights the data subjects may exercise in relation to their personal data,
- what are the legal remedies the data subjects may seek for.

These pieces of information may vary depending on the purpose they were provided by the data subject for. There is a considerable range of purposes why data are processed by our organisation, as such. Specific purposes are established by law, while in lack of further purposes, we would never be in a position to render our services at the level expected from us by our business partners, athletes and by members of the Association.

Since data subjects usually contact the HTA with the purpose to arrange for some sort of transactions or to take use of some services going to be rendered, the various pieces of information included herein are shown grouped by the matching services, transactions in order to facilitate orientation as regards data processed, when data subjects contact the HTA.

### **Further types of data processing**

This is to inform data subjects that information relating to definite data processing by HTA is included in the specific information sheet made available to them either by the time of or prior to such data collection (e.g. on the form sheet serving data collection), in addition, set forth in the contract, or in the general terms of contract the services are subject to, or in announcements, as well as on the surface 'Privacy Notice' (Adatkezelési Tájékoztató) of [www.huntennis.hu](http://www.huntennis.hu) under the tools/options 'Kapcsolódó tájékoztatók' (Additional Information) as well.

This is to inform data subjects that they are entitled to contact the data controller as regards the following matters: provision of information and data, transfer of data, resp. making available documents to other organisations - all taking place by virtue of the power granted by law, the court, the prosecutor, the investigating authority, the authority performing misdemeanour proceedings, the administrative authority and the National Authority for Data Protection and Freedom of Information ('Nemzeti Adatvédelmi és Információszabadság Hatóság').

If, the specific purpose and the sphere of data have been communicated by the authorities, the Hungarian Tennis Association will upon request of the authorities provide data only to the extent and in the volume being indispensable to the realisation of the purpose set forth in the relevant request.

### **Data Controller**

In respect of any and all data processing included in the Privacy Notice, the Data Controller is the Hungarian Tennis Association (seat: 1037 Budapest, Mikoviny utca 6, Trade Register number: 01-07-0000038, tax number: 18158768-2-42, mailing address: 1037 Budapest, Mikoviny utca 6, website: [www.huntennis.hu](http://www.huntennis.hu)).

### **Availability:**

- in person: Hungarian Tennis Association, 1037 Budapest, Mikoviny utca 6
- by mail: via the Customer Service Department (Ügyfélszolgálati Igazgatóság), 1037 Budapest, Mikoviny utca 6
- by e-mail: [info@huntennis.hu](mailto:info@huntennis.hu)
- by phone: +36-1 803-6210, by leaving a message with your name and address
- by fax: +36 1 803-6222
- Data Protection Officer: Dr. Brányik Györgyi [adatvedelem@huntennis.hu](mailto:adatvedelem@huntennis.hu)
- System Administrator: DiNG.hu Kft., 1053 Budapest, Veres Pálné utca 14, Staircase 2, 1<sup>st</sup> fl. 10 (1053 Budapest, Veres Pálné utca 14, II.lph.1.em.10)

Any and all e-mails, with the name and e-mail address of the sender, with date, time and further personal data included in such e-mail received by the Hungarian Tennis Association will be deleted upon five years the most following the date the data concerned have been provided.

The information on data processing is available online on the website [www.huntennis.hu](http://www.huntennis.hu) under the tools/options 'Adatkezelési tájékoztató' (Privacy Notice).

### **Definitions:**

**'Data subject'** means a natural person who is identified or identifiable by reference to any information.

**'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.

**'Personal data'** means any information concerning the data subject.

**'Sensitive data'** means all data belonging to the special categories of personal data, i.e. personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, as well as genetic data, biometric data allowing the unique identification of natural persons, data concerning health, data relating to the sex life or sexual orientation of natural persons.

**‘Genetic data’** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result primarily from an analysis of a biological sample from the natural person in question.

**‘Biometric data’** means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.

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

**‘Criminal personal data’** means any personal data generated during or before a criminal procedure, in connection with the crime or the criminal procedure, by the authorities responsible for conducting criminal procedures or detecting crimes, or by the prison service organization, that may be attributed to the data subject, as well as any personal data relating to criminal records.

**‘Public data’** means any information and knowledge, recorded in any form and by any means, that do not qualify as personal data and are processed by, or relating to the activity of state agencies, local governments and other bodies or persons with public authorities defined by law, or were generated in connection with the fulfilment of their duties, regardless of the method of their processing and whether they exist alone or in collections, including but not limited to data relating to competence, organizational structure, professional activities and the evaluation thereof, including their efficiency, types of the possessed data, legal norms regulating the operation, as well as data relating to budget management and contracts concluded.

**‘Data of public interest’** means any data that is not covered by the term of public data but the publication, availability or disclosure of which is ordered by law with regard to public interest.

**‘Consent’** means the voluntary, definite and clear expression of the data subject’s will, based on proper information, by which the data subject indicates his or her consent to the processing of the personal data relating to him or her, either in form of a declaration or by means of any other conduct expressing his or her will unambiguously.

**‘Data controller’** is the natural or legal person, or other body without legal personality which, within the framework of a statute or a binding legal act of the European Union, alone or jointly with others, determines the purposes of the data processing, makes the related decisions (including the means of processing) and executes them, or has them executed by the data processor.

**‘Joint data controller’** is the data controller who, within the framework of a statute or a binding legal act of the European Union, jointly with one or more other data controllers, determines the purposes and means of the data processing, makes the related decisions (including the means of processing) and executes them, or has them executed by the data processor.

**‘Data processing’** means, regardless from the applied procedure, any operation or set of operations which is performed on the personal data, such as collection, recording, organisation,

storage, alteration, retrieval, transmission, publication, alignment or combination, blocking, erasure or destruction, as well as the prevention of further use of the data, furthermore the production of voice, image and video recordings and the recording of physical characteristics specific to a natural person (such as fingerprints, palm prints, DNA pattern, iris image).

**‘Data processing for law enforcement purposes’** means any data processing carried out by a person or body performing, within the limits of its powers and responsibilities prescribed by law, activities of preventing or averting threats to public order or public security, crime prevention, crime investigation, conducting criminal procedures or participating in them, preventing and investigating misdemeanours and conducting misdemeanour procedures or participating therein, as well as executing the sanctions imposed in criminal or misdemeanour procedures (hereinafter collectively referred to as ‘agencies carrying out law enforcement-related data processing’), within the framework of and for the purposes of the above activities, including the processing of the personal data related to the above activities for archives research, academic, statistical or historical purposes (hereinafter collectively referred to as ‘law enforcement purposes’).

**‘Data processing for national security purposes’** means any data processing carried out by national security services within the limits of their powers and responsibilities prescribed by law, as well as any data processing carried out by the counter-terrorism department of the police within the limits of its powers and responsibilities prescribed by law, which falls within the scope of the act on national security services.

**‘Data processing for defence purposes’** means any data processing that falls either within the scope of the act on the data processing by the defence forces, or within the scope of the act on the registration of foreign armed forces staying in the territory of Hungary to perform duty and of international military commands established in the territory of Hungary and their personnel.

**‘Transmission of data’** means providing access to the data for a specified third party.

**‘Indirect transmission of data’** means the transmission of the personal data to a data controller or data processor performing data processing in a third country or in an international organization by means of transmitting them to a data controller or data processor performing data processing in another third country or international organization.

**‘International organization’** means any organization subject to public international law and its subordinated organs, as well as any other organization which was established by a treaty between two or more states or was established on the basis of such treaty.

**‘Disclosure’** means rendering the data accessible to any person.

**‘Deletion of data’** means rendering the data unrecognizable in a way that it cannot be restored any more.

**‘Restriction of processing’** is blocking the stored data by marking it in order to restrict its further processing.

**‘Destruction of data’** means the physical destruction of the data storage medium containing the data.

**‘Data processor’s activities’** refer to the operations of data processing carried out by the data processor on behalf of or in conformity with the instructions given by the data controller.

**‘Data processor’** is the natural or legal person, or other body without legal personality which, within the framework of and on the conditions laid down by a statute or a binding legal act of the European Union, processes personal data on behalf of or in conformity with the instructions given by the data controller.

**‘Data source’** means the agency performing public duties which generated the public data to be obligatorily published by electronic means, or during the operation of which such data was generated.

**‘Data publisher’** means the agency performing public duties, which publishes the data sent to it by the data source to a website, if the data source itself does not publish it.

**‘Data set’** refers to the entirety of data processed in a single register.

**‘Third party’** means any natural or legal person, or body without legal personality other than the data subject, controller, processor and persons who, under the authority of the controller or processor, perform operations of data processing on the personal data.

**‘EEA State’** refers to Member States of the European Union and other states that are parties to the Agreement on the European Economic Area, as well as the states the citizens of which enjoy the same legal status as the citizens of states that are parties to the Agreement on the European Economic Area, under an international treaty concluded by and between the European Union and its Member States and that state not party to the Agreement on the European Economic Area.

**‘Third country’** refers to all non-EEA states.

**‘Personal data breach’** means the breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized transmission or disclosure of, or unauthorized access to personal data transmitted, stored or otherwise processed.

**‘Profiling’** means any form of automated processing of personal data, which is directed at the evaluation, analysis or prediction of the personal aspects of the data subject, such as the aspects concerning his or her performance at work, economic situation, health, personal preferences or interests, reliability, behaviour, location or movements.

**‘Recipient’** is the natural or legal person, or body without legal personality which is granted access to the personal data by the data controller or the data processor.

**‘Pseudonymization’** means the processing of personal data in such a manner that it can no longer be attributed to a specific data subject without the use of additional information that is stored separately from the personal data, and that ensures, by taking technical and organizational measures, that the personal data shall not be attributed to an identified or identifiable person.

## **Logging by the Server [www.huntennis.hu](http://www.huntennis.hu)**

When visiting the website [www.huntennis.hu](http://www.huntennis.hu) automatic logging of the user's activity will take place.

### **On which grounds is HTA entitled to the processing of personal data?**

The legitimate interest of HTA to the safe operation of the website, as set out in point f), paragraph 1, Article 6 of GDPR.

### **Which personal data are processed?**

Type of personal data processed: date and time, IP-address of the user's computer, data relating to the web browser and the operating system of the user's computer, as well as the address of the website so visited.

### **For which purposes are personal data processed?**

During visits to the website, the service provider processes the visitors' data for the purposes of supervising the functioning of the service, providing customized/personalized services and preventing any misuse.

### **The period for which personal data are processed**

Period of data processing is 30 days upon the date the website was visited on.

### **Whether or not we engage a data processor?**

Name and seat of the data processor: One Online Interaktív Műhely, 3300 Eger, Vasút utca 10

### **Who will have access to the personal data?**

The IP address is a sequence of numbers through which the computers and mobile devices of users accessing the Internet can clearly be identified. By means of IP addresses, the visitor using a given computer can even be geographically localized. Addresses of the visited websites, data relating to date and time are in themselves ineligible for the identification of the data subject but when combined with other data (e.g. data provided when registering), they are eligible for drawing conclusions relating to the user.

Possible contents customized to the user will be provided to him/her by the server of the external service provider. Detailed information on data processing of the data by the servers of external services providers can be obtained from the Data Controllers set forth below:

Independent measurement and auditing of the data on visiting the website [www.huntennis.hu](http://www.huntennis.hu) and other web analytics data are assisted by the server of Google Analytics as an external service provider. Detailed pieces of information on the processing of measurement are provided on the data controller's following website: <http://www.google.com/intl/hu/policies>.

**Task of the Data Processor:**

Providing online memory space.

HTA does not combine the data generated during the detailed analysis of log files with any other data, neither does it strive to identify the user's person. The IP address is a sequence of numbers through which the computers and mobile devices of users accessing the Internet can clearly be identified. By means of the IP addresses, the visitor using a given computer can even geographically be localized. Addresses of the visited websites, data relating to date and time are in themselves ineligible for the identification of the data subject, but when combined with other data (e.g. data provided when registering), they are eligible for drawing conclusions relating to the user.

**Data processing carried out by external service providers in relation to log files:**

The HTML code of the website includes links from and to external servers that are independent from HTA. The server of the external service provider is in direct contact with the user's computer. We kindly remind our visitors that the service providers of those links, due to the direct contact with their servers and the direct communication with the user's web browser, can collect the users' data (e.g. the IP address, data relating to web browser and operating system, cursor moves, addresses of visited websites, date and time of visits).

**Data Processing as regards the Employment Market**

Regarding the currently vacant positions, the applications received with the purpose of employment are processed by the HTA.

**On which grounds is HTA entitled to the processing of personal data?**

Data are processed by the HTA, based on the freely given consent of the data subject, which means, that such data are provided to the HTA by the data subject itself.

**Which personal data are processed?**

The personal data provided in the course of application for a vacant position, thus in particular:

name, contact data, phone-number, e-mail address, data included in the CV (usually data serving the identification, such as place and date of birth, education, qualification, skills, professional experiences, expectations of the applicant as regards the position applied for). Data specified in the Letter of Motivation (purpose of the motivation to apply for a position at HTA). Data included in documents on education (language knowledge level, diploma, average result of the GCE, etc.) Data relating to reduced capacity to work (Expert's Opinion issued by the Technical Authority on the state of health of the person, the range of disability, the health impairment and the extent of the reduced capacity to work) /§ 23 Article (7) of Act No. CXCI of 2011/.

If, documents are sent to HTA with the purpose to acknowledge the applicant's reduced capacity to work, please note, that beyond the data serving the identification, the data relating to the reduced capacity to work and the state of health, the extent of health impairment and the



fact of disability, any and all data in such documents (thus data relating to the nature of health impairment, the medical treatments and illnesses) shall completely be deleted.

### **For which purposes are personal data processed?**

The HTA is authorised to process these data for purposes set forth below: identification of the applicant for a vacant position, the registration of same, as well as to address, contact and notify the person so concerned, resp. to give answer to questions raised in connection with such vacant position.

### **The period for which personal data are processed**

Data of the applicants for vacant positions will be processed for a period of one year upon receipt of the application by HTA. Thereafter, data will be deleted without any specific notification, and the documents received will either be destroyed or returned to the applicant. Applicants may even prior to this dead line withdraw their respective applications (cancellation of the consent given to data processing). In this case, the HTA will upon such cancellation delete the data, and will either destroy the received documents or return same to the applicant.

### **Whether or not we engage a data processor?**

No data processor will be engaged by HTA with the purpose of processing data regarding the employment market.

### **Who will have access to the personal data?**

The following persons are entitled to have access to these data: employees being in charge of selecting the proper applicants, resp. the future manager (the person entitled to exercise employer's rights) of the applicant passing decision on the employment of the person that has filed his/her application for a vacant position.

## **Data Processing as regards Registration in the Online Entry-System**

### **On which grounds is HTA entitled to the processing of personal data?**

Data are processed by HTA, based on the voluntary consent given by the person so affected, which means, that such data are provided to the HTA by the data subject itself. Data processing is performed by virtue of point a), paragraph 1, Article 6 of GDPR, and according to § 169 Article (2) of the (Hungarian) Accounting Act.

### **Which personal data are processed?**

Certain services of the HTA are rendered not only in person but via an online surface, too. The so-called Online Entry-System (OES – abbreviation in Hungarian: ONR) has been developed for this purpose, that can be reached on the website [www.huntennis.hu](http://www.huntennis.hu) by using hereto the tool/options 'ONR'. With the purpose of registration for specific tournaments, the data being necessary to visit the ONR surface (e.g. the athlete's name, phone number, birth date, e-mail address) are processed according to provisions included in (the Hungarian) Act No. 1 of 2004 on Sports.

### **For which purposes are personal data processed?**

Data processing is indispensable to the entry and to participating in the tournament. As regards persons of minor age, whose parents have separated or divorced, only the parent entitled to hold parental responsibility, can make a valid registration through the Online System. It is no task of the HTA to deeply study this problem, HTA has to accept the parent's information provided hereon with the proviso that for the case of dispute, the authority having competence (court of guardians, court) shall find a solution for this issue.

### **The period for which personal data are processed**

Upon request of the person so affected, data will be deleted during the term of the legal relation created by virtue of the registration, resp. afterwards. Repeated registration is namely made possible in the event of an inactive status – without providing these data again.

### **Whether or not we engage a data processor?**

No data Processor will be involved by the HTA for processing the data stored in the OES.

### **Who will have access to the personal data?**

The following persons are entitled to become familiar with and to have access to data provided at registration in the OES System: the programme coordinator of HTA, the tournament manager resp. their employees in the back-office. Those employees of the HTA may have access to data, who are in charge of the entry-records and perform the tasks relating to these entries. Beyond the above, our employees (i) dealing with complaints in connection with entries, resp. (ii) exercising control over the services rendered may have access to these data, too. The internal operation of the HTA, as well as the work performance of same in compliance with the relevant provisions are regularly monitored through its organisational units appointed for this purpose, thus the employees being in charge of monitoring (associates in charge of monitoring the operations and data-protection officers – DPO-s) may have access to these data, if, it is indispensable to the performance of their monitoring work.

### **Data Processing in Connection with Tennis-Cards**

#### **On which grounds is HTA entitled to the processing of personal data?**

- the legitimate interest of performing a contract, as set out in point b), paragraph 1, Article 6 of GDPR,
- processing based on the consent given by the data subject, as set out in point a), paragraph 1, Article 6 of GDPR,
- compliance with a legal obligation, as set out in point c), paragraph 1, Article 6 of GDPR.

Data are processed by HTA, based on the freely given consent of the data subject, which means, that such data are provided to HTA by the data subject itself.

As regards persons of minor age, whose parents have separated or divorced, only the parent being the holder of parental responsibility, can make a valid registration through the Online System.

### **Which personal data are processed?**

Serial number of the card, the Holder's: name, e-mail address, phone number, invoicing address – with the purpose of issuing the invoice; in addition, method of payment to give instructions to further steps depending on the very method of payment (e.g. 'to get directed to the payment site, if paying with credit cards).

### **For which purposes are personal data processed?**

Data processing in connection with using the Tennis-Card is performed with the purpose of documentation, communication, resp. of allowances and services to be granted and rendered.

### **The period for which personal data are processed**

Data are processed for a period of five years upon the validity of the Card has expired.

### **Whether or not we engage a data processor?**

No data Processor is involved by the HTA for processing data stored in the Tennis-Card System.

### **Who will have access to the personal data?**

The following persons are entitled to have access to the data provided at registration to the Tennis-Card System: the programme coordinator of HTA, the tournament manager, resp. their employees in the back-office. Those employees of the HTA may have access to said data, who are in charge of tasks as regards the issue and verification of the Tennis-Cards. Beyond the above, the employees (i) dealing with complaints in connection with the Tennis-Cards resp. (ii) exercising control over the services rendered may have access to these data, too. The internal operation of the HTA, as well as the work performance of same in compliance with the relevant provisions are regularly monitored via its organisational units appointed for this purpose, thus the employees being in charge of monitoring (associates in charge of monitoring the operations, data-protection officers – DPO-s) may become familiar with the data, if, it is indispensable to the performance of their monitoring work.

## **Data Processing as regards Contracted Athletes**

### **On which grounds is HTA entitled to the processing of personal data?**

- the legitimate interest of performing an agreement, as set out in point b), paragraph 1, Article 6 of GDPR,
- processing based on the consent given by the data subject, as set out in point a), paragraph 1, Article 6 of GDPR,
- compliance with a legal obligation, as set out in point c), paragraph 1, Article 6 of GDPR.

As regards persons of minor age, whose parents have separated or divorced, only the very parent being the holder of parental responsibility, can make a valid registration in the Online System.

### **Which personal data are processed?**

ID-data of the athlete, in his/her capacity as natural person, thus: the athlete's: name, residential address or temporary place of residence, phone number, e-mail address, ID-card number, place and date of birth, mother's name, tax ID number, bank account number.

### **For which purposes are personal data processed?**

Data processing that is necessary to the performance of the contract is provided for by Law, while there are further purposes, too, in lack of same our services could not be rendered at a level expected by our athletes.

### **The period for which personal data are processed**

- as regards data processed according to point b), paragraph 1, Article 6 of GDPR: until necessary to the successful performance, however, no later than by termination of the contractual relation,
- regarding data processed according to point a), paragraph 1, Article 6 of GDPR: until the consent given is withdrawn,
- as regards data processed according to point c), paragraph 1, Article 6 of GDPR: for the period (8-10 years) specified in § 166 Article (1) of (the Hungarian) Act C of 2000 on Accounting.

### **Whether or not we engage a data processor?**

A data processor will be engaged by HTA only in connection with data processed according to point c), paragraph 1, Article 6 of GDPR.

Data processing is performed by: BIBOVI Bt.; 2030 Érd, Tárnoki út 126 (Tax-number: 22132860-1-33)

### **Data Processing as regards Photographs**

#### **On which grounds is HTA entitled to the processing of personal data?**

Data processing takes place by virtue of the freely given consent of the data subject.

#### **Which personal data are processed?**

Photo made of the data subject.

**For which purposes are personal data processed?**

Data management means in present case that photos are made of the athletes to illustrate their role in social life, and to record their actions in connection with their respective sporting activities.

**The period for which personal data are processed**

Data processing will take place until the consent is withdrawn by the data subject.

**Whether or not we engage a data processor?**

No data processor will be engaged by HTA to process data stored in the photo-records.

**Data Processing in connection with operating CCTV**

CCTV systems are operated in properties of the HTA. Information on signals received from the cameras can be obtained on the spot where they are operated at. In present Privacy Notice only those general rules are summarized according to which such cameras are operated by HTA.

**On which grounds is HTA entitled to the processing of personal data?**

Processing of personal data in the course of operating a CCTV-system by HTA is based on the legally and socially acknowledged legitimate interest of HTA [as set out in point f), paragraph 1, Article 6 of GDPR] to protect the assets of persons staying in its buildings, the property and assets of HTA, as well as data processed by and entrusted to it, which all require that the processes taking place within its buildings are to be followed and monitored by video recording.

**Which personal data are processed?**

Photo of the data subject.

**For which purposes are personal data processed?**

The reason of processing the recordings made by cameras of the CCTV-system is to hinder possible crimes and to protect the life and assets of visitors and of its employees in these buildings, in addition to protect the assets of HTA, moreover, to enable detection of eventual crimes jeopardizing the above.

**The period for which personal data are processed**

Recordings taken in premises where cash is handled, will be stored for 30 days the most. Any and all recordings in further cases will be stored for three business days and deleted upon the expiry of this period.

**Whether or not we engage a data processor?**

In general, HTA will not engage data processors to operate the CCTV systems, these are operated by HTA itself.

### **Who will have access to the personal data?**

Access to recordings by the CCTV system can have - only in justified cases - exclusively the associates of HTA performing facility management tasks.

The followings can have access to the recordings, too: courts or authorities by virtue of law, resp. persons whose rights or legitimate interests are affected by such recording.

The person, whose rights or legitimate interests are affected by the such recording, or by the recording of his/her further personal data may request the HTA within the period such data are preserved for, not to delete or destroy the recording (to neglect destruction), while the request is to be made by duly stating his/her rights or legitimate interests in this connection.

Exclusively upon request of courts or other authorities will HTA disclose the recording to the courts or authorities filing the request herefor. If, no such request is made by courts or authorities within 30 days upon the date such neglecting the destruction has been asked for, the recording will be deleted or destroyed by HTA, save in cases for which the deadline specified in present Privacy Notice has not expired yet.

### **Running of Prize Competitions/Lotteries/Draws**

With the purpose of promoting its products, services and events, the HTA is organising Prize competitions/lotteries/draws, too. In the course of same, data of pools punters and participants are processed by it in order to draw the winner from among them, and to overhand to the winners their respective prizes.

### **On which grounds is HTA entitled to the processing of personal data?**

Data processing by HTA of data of pools punters and participants is made by virtue of the freely given consent of the latter [as set out in point a), paragraph 1, Article 6 of GDPR], which means that data of the data subjects are provided by them voluntarily on the basis of provisions included in the relevant privacy notice of the game, so that they may participate in the current prize competition/lottery/draw organized by HTA.

### **Which personal data are processed?**

The following data are processed: the participants' or pools punters' name, address, phone number, e-mail address, date of birth, photo, ID number (Facebook ID code, etc.).

Depending on conditions of the various prize competitions/lotteries/draws, HTA will request only certain data from among those listed hereabove. In each case namely those data, which are indispensable to the realization of the given prize competition/lottery/draw, and only by the time such data provision becomes necessary. Information hereon is included in the prevailing rules of the given prize competition/lottery/draw.

### **For which purposes are personal data processed?**

Data are processed by HTA exclusively for purposes set forth below, namely processing of the:

- name: to identify the participant/pools punter, and to arrange for tax-payment in respect of the prize due to the winner,
- address: to identify the participant/pools punter, and to contact resp. notify the winner,
- phone number: to contact resp. notify the winner,
- e-mail address: to contact resp. notify the winner,
- date of birth: to verify the right of participating in the prize competition/lottery/draw – if it provided for in the relevant rules,
- photo: to make photos on receipt of the prize, and to use such photo in the information leaf-let or brochure of the prize competition/lottery/draw,
- ID code (e.g. Facebook): to identify the participant/pools punter.

The above listed data of data subjects are necessary to run by HTA the prize competition/lottery/draw, and to draw the prizes, contact the winners and overhand the respective prizes to them by HTA.

In addition, to make photos on overhanding the prizes and to publish these photos in the game information leaflet or brochure of the prize competition/lottery/draw, if due consent is given by the winner so that photos can be taken of him/her by the time of overhanding the prize to same.

### **The period for which personal data are processed**

The data subjects' data will be processed by HTA until drawing, and will thereupon be deleted. Merely data of the winners will further on be processed by HTA, until takeover of the prizes, and, if, the obligation has been assumed by HTA to perform the relevant tax-payment, the data processed in connection with the taxation under Article 19.2 will be processed for a period of five years upon the date of filing the tax return [as set out in § 202 of Act No. CL of 2017 on Taxation]. During the prize competition/lottery/draw, data subjects may most obviously withdraw at any time their consent given to data processing of their respective data, and HTA will in such a case delete these data. Those participants/pools punters whose data have upon their own request been deleted by HTA prior to the drawing, can neither participate in the prize competition/lottery/draw nor become the winner of the game. While the winner, that has requested deletion of his/her data prior to receipt of the prize, will no longer be in a position to receive the prize itself. Withdrawal of the consent given to data processing will not affect the lawfulness of data processing prior to such withdrawal – made by virtue of the consent so given.

### **Whether or not we engage a data processor?**

Some prize competitions/lotteries/draws require the engagement of a data processor by HTA. Prior information hereon will be provided in the rules of the given prize competition/lottery/draw.

### **Who will have access to the personal data?**

From among the associates of HTA being in charge of communication, the employees appointed to organize the prize competition/lottery/draw and to realize the drawing (campaign managers and communication associates) can have access to these data. If, the obligation is assumed by HTA to perform – in lieu of the winner - payment of taxes in respect of the prize,

the employees in charge of preparing the tax returns may have access to data pertaining to the performance of taxes as well.

Data of the winners being necessary to their respective notification will be published by HTA in compliance with the relevant rules of the prize competition/lottery/draw, thus everybody may have access to these data.

If, the winner has given his/her consent to HTA to take photos when the prize is received, and to use these photos in information materials relating to prize competitions/lotteries/draws, the photos so concerned will be published officially.

### **Use of Cookies**

Please note, that with the purpose of identifying the Users, small data files (hereinafter referred to as 'cookies') are used on our website [www.huntennis.hu](http://www.huntennis.hu). These cookies are secured by Google and used via the Google Analytics system. By visiting the website and using certain functions of same, the User will give its consent to the storage of said cookies in the User's computer, and the User will agree that the Service Provider, in its capacity as Data Controller should have access to same.

Cookies will be stored for a period of 30 days, while Users can with the assistance of the browser set and block the activity relating to such cookies. On the other hand, however, let us call the attention of Users to the fact in this latter case that without the use of cookies it might happen that Users would not be able to benefit from all of the services of the website.

The Service Provider, in its capacity as technical contributor, may grant that in the course of visiting the websites, the third parties co-operating with the Service Provider – and in particular with the assistance of the cookies of Google Inc. – can store (rather remember) if, the User has previously already visited the website of the Service Provider, and as a result of same ads may be displayed by them on the User's computer.

Users are able to delete cookies from their own computers, resp. can set their browsers to forbid the application of said cookies.

A User is at any time entitled to request information on his/her data processed in the system of the Service Provider. In this respect, the Service Provider is obliged to adequately and forthwith, however, no later than within five (5) days instruct the User on the availability of the Regulation and provide the information as regards data processing in order to grant receipt by the User of the followings: data processed, purpose and legal basis of data processing, period of data processing, resp. the specification of persons/entities that have received the User's data, and specification of the purpose of same.

Subject to the form of the requested information, Users will get the answer in writing within 20 (twenty) days either in blue print or by electronic means. If, the User has requested to provide the information in blue print, the possible costs so occurring will be charged.

In the light of the fact that a User may protest against processing his/her personal data, or may request the restriction of same, thus the Service Provider shall within 20 (twenty) days restrict such data processing according to the request, resp. shall follow the relevant decision passed hereon, and provide the accurate information to the User by electronic means.



## **Data Security**

HTA will take through the involvement of its organisational units, any and all security, technical and organisational measures which are to grant data security.

### **Organisational Measures**

Access to the IT-systems of HTA is made possible by the latter by the individual and special authorisation of persons. As regards the allocation of such entitlements, the „principle of necessary and sufficient rights” will prevail, thus the IT-systems and services of the Company shall be available to its users only to the extent and merely for the period being necessary to the performance of their own official tasks, obviously subject to the relevant entitlement. The right of access to the IT-systems and services shall only be granted to persons, who are not subject to any restriction for security or other reasons (e.g. incompatibility), and are in possession of the knowledge of professional, business and data security nature, which all are indispensable to the safe use thereof.

The own internal operation is managed by HTA by virtue of its rules on internal operation, too.

As regards the rules on internal operations which affect the processing of personal data – both in respect of their shaping and amendment - the prior expertise of the Data Protection Officer shall be obtained.

Each employee of the HTA will by the time of entering into an employment relation with it, undertake in writing to comply in a very strict manner with the secrecy rules, and they shall in the course of performing their respective work act in compliance with these rules on secrecy.

### **Technical Measures**

The buildings operated resp. used by HTA as well as the premises therein, and thus the data processed, controlled and stored in these premises are protected by HTA by means of various protection systems (e.g. alarm system, CCTV, access control system – being necessary to verify the entitlement, fire alarm system, etc.).

Data – save those stored by its data processors – are stored by HTA in its data centre on own devices. The IT devices in which data are stored, are stored separated in an accurate manner by Magyar Posta Zrt. in a specific, closed server room, protected by an access control system to verify the entitlement to access.

The internal networks are protected by a multilevel, active system against external attacks and against complex injurious codes (e.g. anti-virus software).

External access being indispensable to the IT-systems operated by HTA and to databases are granted via encrypted data links. (VPN)

The HTA will take all reasonable measures so that its IT devices and various software would in an ongoing manner correspond to the generally accepted technological solutions of the market.

In the course of development, systems have been elaborated, in which the procedures/operations can be controlled and traced back by means of logging, and similarly, incidents, like unlawful access can be detected.

Data stored by HTA in blue print, will be destroyed by it in compliance with the provisions/requirements of the data protection rules by the time the period of data retention expires. The destruction of data is made by the employees of HTA involved in data processing, by using hereto shredders in compliance with strict security requirements.

### **What rights do I have in connection with my data (rights of data subjects)**

#### **Rights due to data subjects:**

- ☐ withdrawal of consent,
- ☐ request for access (for information),
- ☐ request for rectification of data,
- ☐ request for deletion of data,
- ☐ request for the restriction of data processing,
- ☐ objection against data processing,
- ☐ request for intervention in person in the event of automatic decision making,
- ☐ request for data portability.

#### **Withdrawal of Consent**

When personal data are processed by HTA on the basis of the data subject's consent, the latter has at any time the right without any restriction, whatsoever, to withdraw the consent given by him/her. By doing so, the data subject can express that he/she does no longer want to have its data processed by HTA. This would, however, in no way affect the lawfulness of data processing performed prior to such withdrawal. As consequence of the withdrawal of said consent, the personal data so processed by HTA will be deleted by the latter. Deletion of such personal data will, however, not take place, if processing of said data is necessary to:

- perform a contract, where the data subject is one of the contracting parties, or to take measures requested by the data subject prior to contracting,
- perform legal obligations or tasks of public interest, or
- protect the interest of vital importance of the data subject or of other persons, or
- assert the legitimate interests of HTA or of third parties.

#### **Request to have access (to get information)**

Data subjects are at all times entitled to request information whether or not their respective personal data have been processed by HTA, and if so, access to these data should be granted to them.

If, data subjects fail to precisely define their interest as regards processing of their respective own data, information will be provided to them on the followings – beyond their own data:

- specification of the data subject's data processed by HTA,
- the source these data were obtained from (source of data),
- the purpose why HTA is processing their data (purpose of data processing),
- what entitles HTA to process the data (legal basis),
- specification of the period data are processed by HTA - from and until (term),
- whether or not a data processor will be engaged by HTA to process these data,
- if, a data processor is engaged for this purpose, specification of:
  - the name (data processor's name),
  - the address (data processor's address),
  - the purpose these data are processed for (specification of the activity relating to data processing),
- whether or not the data of data subjects have been transferred by HTA to a third party, and if so, specification of the person/entity these data were transferred to (recipient of the data transfer),
- specification of the rights due to data subjects in connection with processing their respective data,
- if, data of the data subjects are transferred by HTA beyond the EEA area (member states of the European Union and Norway, Lichtenstein, Iceland) or to international organizations, special information on what grants the adequate and proper data processing in said cases.

In certain cases and by virtue of provisions of law, HTA must refuse providing the information – e.g. with the purpose of the preventing crimes, or for national security reasons.

### **Request for rectification (amendment) of data**

Data subjects may request the rectification of their respective data. If, erroneous, or false data have been processed by HTA, data subjects may request the amendment of these data, and the data processing of the correct and true data.

The authenticity of a data requested to be amended, shall duly be supported by the data subject, and it shall be proven by same that he/she is the very person entitled to request the amendment of said data. The HTA can namely only in this way verify whether or not the new data is true and correct, and if so, whether or not HTA may amend the former data.

If, it fails to be obvious that a data processed is correct or true, no rectification of the data by HTA will take place, but such data processing will be restricted until the authenticity of same is verified.

### **Request for deletion of data**

Data subjects may request the deletion of their respective data.

In the event of data processing by virtue of the data subject's consent, HTA will consider the request for data deletion as withdrawal of the consent so given, and will delete the personal data. However, no deletion of data will take place, if data processing is necessary to the followings, namely, to:

- the performance of an agreement, to which the data subject is one of the contracting parties, or, to take the necessary measures prior to contracting - by virtue of the request made by the data subject,
- the compliance with legal obligations or to the performance of tasks of public interest, or
- the protection of interests of vital importance of the data subject or of third parties, or
- the assertion of legitimate interests of the HTA or of third parties.

If, deletion of data has been requested by the data subject in respect of a data processing, which is necessary to the performance by HTA of its tasks of public interest, [as set out in point e) paragraph 1 of Article 6 of GDPR], or it is made on the basis of legitimate interests of HTA or of a third party [as set out in point f) paragraph 1 of Article 6 of GDPR], this request for deletion will be considered by HTA as an objection against data processing concerned. If, the objection is well-founded (there is namely no reason why the data concerned should be processed) the data will be deleted by HTA.

If, data processing is necessary to the performance of an agreement, or, to measures to be taken prior to contracting - upon request of the data subject, to the performance of legal obligations, or to the protection of interests of vital importance (e.g. protection of life) of data subjects or of third parties, data will be deleted by HTA if such personal data are no longer necessary – irrespective of the request for deletion.

In further cases, HTA will delete the data, if the violating nature of such data processing is established, or the deletion is specified as a legal obligation set forth in Hungarian or in EU Law.

Data shall not be deleted by HTA if, it is obliged to process the data (i) by virtue of a legal obligation, or (ii) because of the performance of its tasks of general interest, resp. (iii) for public interest within the sphere of public health (e.g. to hinder epidemic danger). Data shall similarly be preserved, which must be processed with the purpose of scientific research, archiving or statistical tasks, resp. which are necessary to the submission, assertion resp. protection of legal claims.

### **Request for restriction of the data processing**

Data subjects may request HTA to restrict processing of their respective data. In such a case data of data subjects will not be used, only stored by HTA. Restriction of processing the data of data subjects will take place, if the data subject has

- disputed the accuracy of his/her data processed by HTA, but the accuracy of the data subject's data must still be verified,
- objected the deletion of his/her data by HTA, and has requested the preservation of same,
- requested the preservation of his/her data by HTA, for it is the intention of the data subject to assert legal claims be using hereto these data (e.g. he/she is going to file a claim),
- protested against the data processing, and it has still to be examined whether or not such protest has been well-founded.

Data subjects will be informed in advance by HTA on releasing such restriction.

### **Objection against data processing**

Data subjects are entitled to object against processing their respective data. If, such objection is well-founded, in other words there is no justified reason with compelling force for data processing, HTA will discontinue data processing and delete the data.

Data subjects may object the data processing, if it is necessary to the performance by HTA of its tasks carried out in public interest [as set out in point e) paragraph 1 of Article 6 of GDPR], or, it is made on the basis of legitimate interest of HTA or of a third party [as set out in point f) paragraph 1 of Article 6 of GDPR].

Data shall not be deleted by HTA it is obliged to process (i) by virtue of a legal obligation, or (ii) because of the performance of its tasks carried out in general interest, resp. (iii) for public interest within the sphere of public health (e.g. in the event of an epidemic). No data shall be deleted, which are necessary to the submission, assertion resp. protection of legal claims.

### **Request for intervention in person in the event of automated decision making**

Data processing by virtue of an automated decision making means that some 'result' in respect of the data subject is generated by an automatism on the basis of the provided data, and there is no single part of the entire process where a human being would have any role in exercising influence on what to the data subject will happen by virtue of his/her personal data.

In cases set forth hereabove, data subjects may request the supervision of the decision by a human being, if

- said automated decision-making takes place by virtue of the consent given, or if
- it is necessary to the conclusion of an agreement with the data subject itself, or to taking measures prior to such contracting (e.g. assessment of a request for concluding an agreement).

No intervention by a human being may be requested, if such data procession by automated decision-making is provided for by Law.

### **Request for data portability**

A data subject may request Magyar Posta Zrt. that his/her data provided to HTA and processed in the IT-system of HTA be made available to such data subject in electronic form, so that these data can be transferred by the data subject to another data controller.

Portability of data may be requested by data subjects in cases of data processing where it is made by virtue of the consent given [as set out in point a) paragraph 1 of Article 6 of GDPR], or if such data processing is necessary to the performance of an agreement to which the data subject is one of the contracting parties, or it is necessary to measures to be taken prior to contracting - upon request of the data subject [as set out in point b) paragraph 1 of Article 6 of GDPR].

The data will be provided by HTA in .xml or .csv. format – subject to the functionality of the data processing system.

If, it is requested by a data subject that his/her data be transferred directly by HTA to another data controller, HTA will examine whether or not it is in possession of an adequate data link

that enables the secure and lawful transfer of the data, and if so, data so concerned will directly be transferred by HTA.

Upon the relevant request of the data subject, HTA will give its answer without unjustified delay to the data subject, however, no later than within one month upon such request was filed on. If, the request is extremely complex, or requests of a great number are filed, HTA is entitled to extend the deadline set herefore with a further period of two months, and the data subject will be notified hereon within one month.

If, the request of the data subject cannot be satisfied by HTA for any reason, whatsoever, the data subject will be notified on this fact and on the reasons hereof within one month upon the date of filing such request by the data subject.

This is to inform data subjects that in the event of unjustified requests, or of regularly recurring excessive requests based on the same data, the fee for the relevant performance may be charged or satisfying the request will be refused.

This is to inform data subjects by HTA on the followings: if, in the request of data subjects made on the deletion, rectification or on restriction of data processing they have asked HTA to inform them on (i) the persons processing their respective data, or (ii) the persons/entities their respective data have been transferred to, HTA will provide the information hereon as well - in its answer regarding the satisfaction of their respective requests.

### **Whom can I turn to for the protection of my rights?**

If, you consider processing of your data by HTA as prejudicial, we advise you to contact first HTA regarding your complaint, that will in each case be examined, and all reasonable measures will be taken to deal with such complaint.

If, you find further on injurious the way your data are processed by HTA despite your complaint, or, if you do not want to lodge a complaint but rather turn directly to an authority, so you can do so and file your complaint with Nemzeti Adatvédelmi és Információszabadság Hatóság /Hungarian National Authority for Data Protection and Freedom of Information/ (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, mailing address: 1530 Budapest, Pf. 5, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)).

In addition, you have the possibility, too, to turn to the court with the purpose of protection of your personal data. In this case you may specify at your sole discretion the Court of Justice (having competence either according to your place of residence or to your temporary place of residence) to file your complaint with (<http://birosag.hu/torvenyszekek>).

You can find the Court of Justice having competence either according to your place of residence or to your temporary place of residence on the website: <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.