



Data Processing Notice

concerning the data processing activities
of PractiWork Zrt.

Valid from: 27.08.2026.



1.	The Data Controller	2
2.	Purpose of this Notice	2
3.	Applicable Legislation.....	2
4.	TERMS RELATED TO DATA PROCESSING:	3
5.	Data protection policy.....	5
6.	PROCESSING ACTIVITIES.....	6
6.1.	Contact, Requests for Quotations, Contract Performance	6
6.2.	Skill Identification	7
6.3.	Appointment Booking for Skill Identification	8
6.4.	Processing for Statistical Purposes.....	8
6.5.	Taking Photographs and Video Recordings.....	9
6.6.	Processing of Minors' Data.....	10
6.7.	Displaying Employees on the Website	10
6.8.	Use of Cookies	11
7.	RECIPIENTS OF PERSONAL DATA.....	12
8.	LOCATION OF THE DATA PROCESSING	13
9.	RETENTION PERIOD OF THE DATA	13
10.	PERSONS ENTITLED TO ACCESS THE DATA.....	14
11.	THE DATA SUBJECT'S RIGHTS RELATING TO THE PROCESSING.....	14
11.1.	The Right of Access.....	14
11.2.	The Right to Rectification	14
11.3.	The Right to Restriction of Processing	14
11.4.	The Right to Data Portability	15
11.5.	The Right to Object.....	15
11.6.	The Right to Erasure	15
11.7.	Deadline for Action.....	15
12.	REMEDIES	15
13.	THE DATA CONTROLLER'S RESERVATION.....	16



1. THE DATA CONTROLLER

Name of the Data Controller:	PractiWork Zrt.
Registered seat and postal address:	1037 Budapest, Jablonka út 103.
Company registration number:	01-10-141111
Tax number:	28949767-2-41
E-mail:	info@practiwork.com
Web:	www.practiwork.com
Name of Data Protection Officer:	Gábor Jobbágy
Data Protection Officer's contact:	jobbagy.gabor@practi.hu

2. PURPOSE OF THIS NOTICE

The purpose of this notice is to set out, across the various business processes of PractiWork Zrt. (hereinafter: the Data Controller), the principles governing the processing of personal data in connection with its customer management, its website available at practiwork.hu, and the skill identification carried out using the PractiWork® system, and to present the standards that the Data Controller has set for itself, as a data controller, and complies with.

3. APPLICABLE LEGISLATION

The Data Controller's data-processing principles are consistent with the applicable domestic legislation on data protection and the related provisions of the European Union:

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Info Act"),
- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, together with the international conventions and European Union legal sources relating to data protection (in particular, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation 95/46/EC) ("General Data Protection Regulation").

In addition, the following legislation and statutes are taken into account:

- Act CL of 2017 on the Rules of Taxation ("Taxation Act"),
- Act C of 2000 on Accounting ("Accounting Act"),
- ITM Decree 1/2018 on the Rules of Digital Archiving ("Archiving Decree"),
- Act CXXXIII of 2005 on the Rules of Personal and Property Protection and Private Investigation Activities ("Security Services Act").



4. TERMS RELATED TO DATA PROCESSING:

This statement uses the definitions provided in the General Data Protection Regulation for technical terms related to data processing.

- **data subject** any natural person who is identified or can be identified, directly or indirectly, on the basis of specific personal data;
- **personal data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one 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;
- **processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **restriction of processing** means the marking of stored personal data with the aim of limiting their processing in the future;
- **profiling** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- **pseudonymisation** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- **filing system** means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;
- **controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- **recipient** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the



processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

- **third party** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- **consent** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- **main establishment** means:
 - a) as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment;
 - b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation;
- **representative** means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation;
- **enterprise** means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;
- **group of undertakings** means a controlling undertaking and its controlled undertakings;
- **binding corporate rules** means personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;
- **supervisory authority** means an independent public authority which is established by a Member State pursuant to Article 51;



5. DATA PROTECTION POLICY

The Data Controller provides its services to companies, legal entities, and natural persons as well. With regard to legal entities, the Data Controller primarily processes data pertaining to their business sphere.

The Data Controller aims to reduce the processing of personal data to the absolute minimum and processes only the personal data strictly necessary for various business transactions.

The collection and processing of personal data is based on a legal obligation or the data subject's voluntary consent, or is necessary for the conclusion and performance of contracts related to the requested skill profiling service.

The Data Controller will not disclose the provided data to the public and will not transfer it to third parties not specified in this statement. An exception to this is data transfer based on a request from an authority or court, or as required by law.



6. PROCESSING ACTIVITIES

6.1. Contact, Requests for Quotations, Contract Performance

Data subjects: Natural persons interested in the skill identification service, and those employees of interested companies who have been assigned a liaison role in this matter and who used the contact form on the practiwork.hu/practi.hu website for this purpose.

Case	Personal data processed	Purpose of processing	Legal basis
The data subject is the representative of a legal person	The data subject's name, company email address, company phone number, the ordering company's registered name, the classification of the workforce employed/sought by the company (trained worker, skilled worker, office worker, etc.)	Contact, providing information, preparing quotations	The data subject's explicit consent
	The data subject's name, company email address	Sending access to the result-communication system	Performance of contract
	The ordering company's registered name, tax number, registered seat	Invoicing	Compliance with the Accounting Act
	The data subject's name, company email address, company phone number	Own marketing activity	The data subject's explicit consent
The data subject is acting on their own behalf	The data subject's name, email address, phone number	Contact, providing information	The data subject's explicit consent
	The data subject's name, email address	Sending the result-sheet link	Performance of contract
	The data subject's name, billing address	Invoicing	Compliance with the Accounting Act
	The data subject's name, email address, phone number	Own marketing activity	The data subject's explicit consent

Source of the data processed: Provided voluntarily by the data subject.

Form of processing: In the mail server's file system (see Chapter 7), in .eml format; on the personal computer of the Data Controller's employee who maintains contact with the client, within the email software, in .eml format; and in the database used by the accounting firm's invoicing software.

Retention period: Until the purpose is fulfilled, but no longer than 5 years from the data subject's consent to the processing.

6.2. Skill Identification

Data subjects: Natural persons using the skill identification service.

Personal data processed	Purpose of processing	Legal basis
The unique identifier number generated at the start of the associated test during the skill identification process; the data subject's answers as raw data; work-related skills, abilities and personality traits	Creating a competency map showing work-related abilities, skills and personality traits, containing professional-fit or career recommendations, based on scores obtained on various psychometric and motor tests and on answers given to questions	The data subject's explicit consent; obligation to perform the contract
The data subject's name, email address	Identifying the data subject. Where the data subject attends an individual session, providing access to (the link to) the result sheet generated during the service. Notification of successful completion of the skill identification	The data subject's explicit consent; obligation to perform the contract

Source of the data processed: Provided voluntarily by the data subject.

Form of processing: In the database of the server that generates the profile (see Chapter 8), in a proprietary format; on the result-communication server visited by the client, in interactive HTML format.

Retention period: Until the purpose is fulfilled, but no longer than 5 years from the data subject's consent to the processing.

During the skill identification and the associated test-solving process, the Data Controller, on the data-recording devices operated for this purpose, collects from the data subject only the above-mentioned personal data used for identification (name and email address), but reserves the right to process, in the same way, some other personal identifier of the data subject based on an individual client request. The Data Controller does not record sensitive data (relating to religion, origin, sexual orientation, or health) during the skill identification, either on the data-recording devices operated for this purpose or on the evaluation or result-communication systems.



In the case of a skill identification service requested and organized by legal persons (companies, organizations) – in which case PractiWork Zrt. acts as data processor – it is the ordering party's employees, the employees engaged by the legal person commissioned by the ordering party, or the natural persons engaged by it, who provide the data subjects with access to the resulting result sheets. They match these up using the participation sheet in their possession, completed at the time of the skill identification. PractiWork Zrt. (in such a case, acting as data processor) accepts no responsibility for the integrity or accuracy of this participation sheet.

6.3. Appointment Booking for Skill Identification

Data subjects: Natural persons using the skill identification service, or, in the case of a minor, the parent or legal representative together with the participant.

Case	Personal data processed	Purpose of processing	Legal basis
The data subject is an adult	The data subject's name, email address, chosen appointment time	Confirming the appointment booking, contact	The data subject's explicit consent, performance of contract
	The data subject's name, email address	Own marketing activity	The data subject's explicit consent
The data subject is a minor	The data subject's name, the name and email address of the data subject's parent or legal representative, chosen appointment time	Confirming the appointment booking, contact	The data subject's explicit consent, performance of contract
	The name and email address of the data subject's parent or legal representative	Own marketing activity	The data subject's explicit consent

Source of the data processed: Provided voluntarily by the data subject.

Form of processing: In the database of the server supporting the Data Controller's business-management system (see Chapter 8), in text format.

Retention period: Until the purpose is fulfilled, but no longer than 5 years from the data subject's consent to the processing.

6.4. Processing for Statistical Purposes

Data subjects: Natural persons using the skill identification service.

Personal data processed	Purpose of processing	Legal basis
The data subject's answers given during the skill identification, as raw data	The Data Controller reserves the right – whether acting as data controller or as data processor – to use the raw data collected during skill identification, in a manner that cannot be linked to the data subjects, for statistical purposes, for the further development and improvement of the PractiWork system, and for preparing studies, whether at a client's request or for its own scientific publication	The data subject's explicit consent, obligation to perform the contract, legitimate interest

Source of the data processed: Provided voluntarily by the data subject.

Form of processing: In the database of the server generating the result sheet following the skill identification (see Chapter 8), in a proprietary format.

Retention period: Until the purpose is fulfilled, but no longer than 5 years from the data subject's consent to the processing.

In processing for statistical purposes, the Data Controller pays particular attention to ensuring that raw data processed for this purpose cannot be linked to data subjects; processing for this purpose may have neither a positive nor a negative effect on data subjects.

The Data Controller reserves the right, when preparing studies, to also make use of large language model services (specifically ChatGPT), subject to the above conditions.

6.5. Taking Photographs and Video Recordings

Data subjects: Natural persons using the skill identification service who take part in the associated event.

Personal data processed	Purpose of processing	Legal basis
The data subject's likeness in group photographs/recordings taken of participants	Proving that the skill identification and the associated event took place	The data subject's explicit consent, obligation to perform the contract
The data subject's likeness in group photographs/recordings taken of participants	The Data Controller's own marketing activity; the recordings made may be published on the Data Controller's website and on its profile pages on various social media platforms	The data subject's explicit consent



Source of the data processed: Provided voluntarily by the data subject.

Form of processing: On the personal computer of the Data Controller's employee taking the recordings, on the Data Controller's website, and on the Data Controller's social media profile pages, in image (.jpg, .png, .webp) or video (.mp4, .mov, .webm) format, as well as in printed form on flyers, brochures and decorative materials.

Retention period: Recordings appearing on the Data Controller's website or social media profiles are retained for a maximum of 5 years, unless archived in the public interest, or until the data subject withdraws their consent.

6.6. Processing of Minors' Data

Skill identification is a service specifically aimed at career orientation and professional fit. It is directed both at working-age, potential adult employees and at young people who have not yet chosen a career – typically students weighing further education or entering the workforce, immediately before their school-leaving examination. Participants who have not yet reached the age of 16 may take part in the event and the associated skill assessment only with the consent of the person exercising parental supervision, and appearing in group photographs or recordings likewise requires the consent of the person exercising parental supervision.

When processing children's data, the Data Controller pays particular attention to data protection, since children have less awareness of the risks associated with data processing.

Where the processing of a child's personal data is based on the data subject's consent to the processing of their personal data by the Data Controller, that processing is lawful only if the child has reached the age of 16 (GDPR Article 8(1)).

In the case of a child who has not reached the age of 16, the processing of the child's personal data is lawful only to the extent that consent has been given or authorized by the person exercising parental supervision over the child.

6.7. Displaying Employees on the Website

Data subjects: The Data Controller's employees.

Personal data processed

The data subject's name, photograph, position held at the Data Controller, link to their LinkedIn profile

Purpose of processing

Presenting the Data Controller's organization

Legal basis for processing: The data subject's voluntary consent.

Source of the data processed: Provided voluntarily by the data subject.

Place of processing: The Data Controller's own server operating the practiwork.hu website (1117 Budapest, Hauszmann Alajos utca 3.).

Form of processing: In the database supporting the practiwork.hu website, in text form.



Retention period: For as long as the data subject remains employed by the Data Controller and does not withdraw their consent or object to the processing of their personal data, but no more than 5 years.

6.8. Use of Cookies

When a visitor opens our website at practiwork.hu, a small data file – a so-called cookie (hereinafter: **cookie**) – is placed on their computer.

The purpose of cookies is to speed up use of the website, to balance the load on the servers, or to assist and simplify use of the website through automated processes. Cookies are files or pieces of information sent by the web server the visitor accesses to the web browser on the visitor's computer. A cookie generally contains the name of the website it came from; its value, i.e. a randomly generated unique number; and its lifetime, i.e. how long it remains on the online communication device. The cookie is stored in a file in the storage of the user's device. The content of the file can be queried from the browser at any time by the web server that sent the cookie.

Cookies may serve various purposes:

- Technical cookies that are strictly necessary for the operation of the site and support the session,
- Third-party statistical or marketing cookies.

The data subject may, in the window that appears when the website is first opened, prohibit or allow the use of third-party cookies.

If the data subject no longer wants previously accepted cookies to remain stored on their device, they may delete them under the Settings/Privacy menu of their internet browser. Please note that fully disabling cookies may, in certain cases, render websites and functions inoperable.

Technical cookies used on the practiwork.hu website

Domain concerned	Data processed	Type of cookie	Purpose of processing	Legal basis	Duration of processing
practiwork.hu	SESSION	Session cookie	Ensuring proper functioning of the website	GDPR Article 6(1)(b)	The period until the current visitor session is closed
practi.hu					
practiwork.com					

Third-party analytics cookies used on the practiwork.hu website

Domain concerned	Data processed	Cookie name	Purpose of processing	Legal basis	Duration of processing
practiwork.hu	Cookie identifier, the visitor's	google.analytics	Conducting business analytics regarding	GDPR Article 6(1)(a), the data	Maximum 1–1.5 years (or until manually



Domain concerned	Data processed	Cookie name	Purpose of processing	Legal basis	Duration of processing
	browsing activity		website visitors	subject's consent	deleted from the browser)
practiwork.com		_GA			
practi.hu		GA*			

7. RECIPIENTS OF PERSONAL DATA

- The evaluation of the raw data recorded during skill identification is carried out by PractiWork Zrt. on its own server, operated in Hungary.
- The practiwork.hu website runs on a server operated, as data processor, by Dexef Kft. (3525 Miskolc, Szent Anna utca 12/B; tax number: 12678804-2-05; email: info@dexef.hu).
- The Data Controller's correspondence relating to its organizational activities runs on a server operated, as data processor, by Dexef Kft. (3525 Miskolc, Szent Anna utca 12/B; tax number: 12678804-2-05; email: info@dexef.hu).
- The Data Controller's correspondence relating to its sales activities is conducted through the Microsoft Outlook service. Microsoft's privacy policy can be found at <https://www.microsoft.com/hu-hu/privacy/privacystatement>.
- The Data Controller's accounting is carried out by D.D.D. Consulting Zrt. (1204 Budapest, Késmárk utca 18.; tax number: 32079348-2-43; email: diglics@t-online.hu).
- The Data Controller uses the Google Analytics service on the practiwork.hu website. Google LLC's (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) policies relating to its analytics service can be found at <https://support.google.com/analytics/answer/6004245?hl=hu>.
- The Data Controller has a LinkedIn profile. The privacy policy of LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland), which operates the LinkedIn social media platform, can be found at <https://www.linkedin.com/legal/privacy-policy>.
- The Data Controller has a YouTube channel. The privacy policy of Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA), which operates the YouTube video-sharing platform, can be found at <https://policies.google.com/privacy?hl=hu-HU&fg=1>.
- The Data Controller has a Facebook profile. The privacy policy of Meta Platforms Inc. (1 Meta Way, Menlo Park, CA 94025), which operates the Facebook social media platform, can be found at <https://hu-hu.facebook.com/privacy/policy>.
- The Data Controller has an Instagram profile. The privacy policy of Meta Platforms Inc. (1 Meta Way, Menlo Park, CA 94025), which operates the Facebook social media platform, can be found at <https://help.instagram.com/155833707900388>.
- The Data Controller has a TikTok profile. The privacy policy of TikTok Information Technologies UK Limited (10 Paternoster Row, London, EC4M 7BQ, UK), which operates the TikTok video-sharing platform, can be found at <https://www.tiktok.com/legal/page/eea/privacy-policy/hu>.

8. LOCATION OF THE DATA PROCESSING

- The evaluation of the raw data recorded during skill identification takes place on PractiWork Zrt.'s own server, operated in Hungary (3525 Miskolc, Szent Anna utca 12/B).
- The server serving the Data Controller's correspondence, located in a server room operated by ATW Internet Kft. (1117 Budapest, Hauszmann Alajos u. 3.).
- The servers providing the Microsoft Outlook service that operates the correspondence of the Data Controller's sales department.
- The personal computer used by the Data Controller's employee who maintains contact with clients.
- The computer running the accounting software used, located at the premises of D.D.D. Consulting Zrt. (1204 Budapest, Késmárk utca 18.; tax number: 32079348-2-43; email: diglics@t-online.hu).
- Processing of data submitted through the application form takes place on the Google Drive cloud service operated by Google LLC.
- The servers serving the Data Controller's LinkedIn profile.
- The servers serving the Data Controller's YouTube channel.
- The servers serving the Data Controller's Facebook profile.
- The servers serving the Data Controller's Instagram profile.
- The servers serving the Data Controller's TikTok profile.

9. RETENTION PERIOD OF THE DATA

- The personal data of natural persons (a legal person's liaison contact; a natural person taking part in an assessment who is a direct client of PractiWork Zrt.; a PractiWorkShop applicant; the representative of a minor taking part in an assessment or in PractiWorkShop) is stored until the data subject requests deletion of their personal data, but for no longer than 5 years.
- For digitally stored backup copies of data held on the mail server or on workstations used at the Data Controller's premises, the Archiving Decree governs.
- For data contained in invoices stored digitally in the invoicing program's database, the Accounting Act and the Archiving Decree govern.
- For correspondence provided via Microsoft Outlook, Microsoft's privacy policies govern.
- [The Data Controller's asset-protection – *text incomplete in the source document*]
- With respect to the retention period for personal data provided when applying for PractiWorkShop, Google LLC's privacy policies govern.
- Recordings made during the PractiWorkShop event that appear on the Data Controller's website or social media profiles are retained for a maximum of 5 years, unless archived in the public interest.
- For photographs and videos appearing on the Data Controller's LinkedIn profile, the privacy policies of LinkedIn Ireland Unlimited Company likewise govern.
- For videos appearing on the Data Controller's YouTube channel, the privacy policies of Google LLC likewise govern.
- For photographs and videos appearing on the Data Controller's Facebook profile, the privacy policies of Meta Platforms Inc. likewise govern.

- For photographs and videos appearing on the Data Controller's TikTok profile, the privacy policies of TikTok Information Technologies UK Limited likewise govern.

10. PERSONS ENTITLED TO ACCESS THE DATA

During the period of processing, the data subject's personal/corporate data may be accessed at the Data Controller only by the Data Controller's head, the members personally involved in the company's activities, and employees or agents who need access to this data to carry out their job duties, in accordance with the various processing activities.

11. THE DATA SUBJECT'S RIGHTS RELATING TO THE PROCESSING

11.1. The Right of Access

The data subject is entitled to request information from the Data Controller, through the contact details given in Section 1, as to whether the processing of their personal data is taking place and, if such processing is taking place, is entitled to learn:

- from the Data Controller:
 - which of their personal data,
 - on what legal basis,
 - for what processing purpose,
 - for how long,

is being processed,

- to whom, when, on what legal basis, and to which personal data the Data Controller has granted access, or to whom it has transferred the data subject's personal data,
- from what source their personal data originates,
- whether the Data Controller applies automated decision-making, including profiling, and the logic involved.

The Data Controller provides the data subject, upon request, with a copy of the personal data undergoing processing free of charge the first time; for any further request, it may charge a reasonable fee based on administrative costs.

In order to meet data security requirements and protect the data subject's rights, the Data Controller is required to verify that the identity of the data subject matches that of the person wishing to exercise the right of access; accordingly, the provision of information, access to the data, and the issuance of a copy are all conditional on verifying the identity of the data subject.

11.2. The Right to Rectification

The data subject may, through the contact details given in Section 1, request that the Data Controller correct inaccurate personal data concerning them, provided the data is still being processed by the Data Controller. If the data subject can credibly prove the accuracy of the corrected data, the Data Controller shall comply with the request as soon as possible, but no later than within one month, and shall notify the data subject accordingly at the contact details they have provided.

11.3. The Right to Restriction of Processing

The data subject may, through the contact details given in Section 1, request that the Data Controller restrict the processing of their personal data (by clearly marking the data as restricted and ensuring that it is processed separately from other data) where:

- they dispute the accuracy of their personal data (in which case the Data Controller restricts the processing for the period required to verify the accuracy of the personal data),
- the processing is unlawful and the data subject opposes the erasure of the data, requesting instead the restriction of its use,
- the Data Controller no longer needs the personal data for the purposes of processing, but the data subject requires it for the establishment, exercise or defence of legal claims,
- the data subject has objected to the processing (in which case the restriction applies for the period pending verification of whether the Data Controller's legitimate grounds override those of the data subject).

11.4. The Right to Data Portability

The data subject is entitled to receive the personal data concerning them that they have provided to a data controller in a structured, commonly used, machine-readable format, and is entitled to transmit that data to another data controller without hindrance from the data controller to which the personal data was provided. In exercising the right to data portability, the data subject is entitled to request, where technically feasible, the direct transmission of personal data between data controllers.

11.5. The Right to Object

The data subject may, through the contact details given in Section 1, object to the processing if, in their view, the Data Controller is not properly processing their personal data in connection with the purpose specified in this data processing notice. In such a case, the Data Controller must demonstrate that the processing of the personal data is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject, or that it is connected with the establishment, exercise or defence of legal claims.

11.6. The Right to Erasure

In connection with the processing described in this notice, the data subject may exercise the right to erasure. In this case, they must be aware that a request for erasure of their data may affect their eligibility to participate, if they wish to exercise this right before the date of the selected event. In other cases, erasure can be carried out in full where the measures required for this do not involve disproportionate effort.

11.7. Deadline for Action

The Data Controller responds to a request by the data subject to exercise their rights without undue delay, but no later than within 72 hours, and complies with it within one month at most from its receipt. The day the request is received is not counted toward this deadline.

Where necessary, taking into account the complexity of the request and the number of requests, the Data Controller may extend this deadline by a further two months. The Data Controller shall inform the data subject of any such extension, stating the reasons for the delay, within one month of receipt of the request.

12. REMEDIES

The data subject is entitled to lodge a complaint with the National Authority for Data Protection and Freedom of Information if a violation of their rights in connection with the processing of personal data has occurred, or there is a direct risk of one occurring. The Authority's contact



details: postal address: 1363 Budapest, Pf.: 9.; telephone: +36 (1) 391-1400; email: ugyfelszolgalat@naih.hu; website: <https://www.naih.hu>.

Any data subject may also turn to the courts in the event of a violation of their rights in connection with the processing of their personal data. Jurisdiction over such proceedings lies with the regional court (törvényszék), which handles the matter as a priority. At the data subject's choice, proceedings may also be brought before the regional court having jurisdiction over their place of residence or habitual abode.

13. THE DATA CONTROLLER'S RESERVATION

The Data Controller reserves the right to amend its data protection notice where necessary. This may occur where the range of services expands, the technical system changes, or where legislation makes it mandatory. However, an amendment of this kind may not result in the personal data being processed for a purpose different from the original one.

