

## **Data Protection Notice**

**On data processing carried out by Andrea Cseresznyés, a  
sole proprietor**

**Effective date:**

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## I. Name and contact details of the data controller

**Name of the data controller:** Andrea Cseresznyés, sole proprietor

**Address:** 4002 Debrecen, Dombhát utca 1.

**Registration number:** 55818890

**Tax number:** 57215860-1-29

**Telephone number:** +36-70-269-6187

**E-mail address:** info@corpusvitae.hu

**Website:** <https://corpusvitae.hu>

## II. Introductory provisions, basic concepts

The Data Controller carries out its activities in order to provide services related to spinal gymnastics and other musculoskeletal complaints, naturopathic treatments and the organization of online trainings, examinations, consultations and advice.

The Data Controller informs the data subjects, within the framework of its activities described above and in relation to other data processing related to its operation, about all facts related to the processing of personal data, in particular about the identity of the **data controller, the purpose of the data processing, the scope of the data processed, the legal basis for the data processing, the duration of the data processing, the use of the data processor, the scope of persons authorized to view the data, the data security measures, the rights of the data subjects and their legal enforcement options.**

This information is available in 1 copy in printed form at the Data Controller's registered office/places of business, and is also continuously available in electronic form on the Data Controller's website.

The Data Controller shall process the data lawfully and fairly, and in a manner that is transparent to the data subject. In order to ensure lawful, fair and transparent data processing, the Data Controller shall compile a clear data processing information for the data subjects. The Data Controller shall implement appropriate technical and organizational measures in order to guarantee the security of the data subjects' personal data.

The Data Controller shall not use or may not use personal data for purposes other than those stated in the information. The Data Controller shall only process data that has been made known to it by the data subject or that has become known to it in other lawful ways, and shall not disclose it to third parties under any circumstances, except in cases specified in the applicable laws. Personal data may only be transferred in accordance with the relevant provisions of the relevant laws and in the cases specified in this information to the extent specified therein.

The Data Controller carries out its data processing within the framework of its activities in accordance with the principles and provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: **GDPR**), Act CXII of 2011 on the right to information self-determination and freedom of information (hereinafter: **Infotv.**), and Act XLVII of 1997 on the processing and protection of health and related personal data (Eüak. tv.).

Basic concepts:

**personal data:** any information relating to an identified or identifiable natural person ("data subject") (e.g. the name, place of residence of the natural person using the service)

**health data:** personal data relating to the physical or mental health of a natural person, including data relating to health services provided to the natural person which carries information about the health of the natural person;

**medical documentation:** a record, register or any other data recorded in any way, regardless of its medium or form, containing health and personal identification data that has come to the attention of the patient care provider (data controller) during medical treatment;

**data subject:** any specific natural person identified or identifiable on the basis of personal data (the natural person using the service is a data subject according to this information);

**data processing:** any operation or set of operations performed on personal data or data files, whether or not by automated means, such as collection, recording, organization, structuring, storage, transformation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**data controller:** the natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. For the purposes of the processing specified in this information, the data controller is the Data Controller;

**data processor:** A natural or legal person, public authority, agency or any other body in a contractual relationship with the Data Controller, which processes personal data on behalf of the Data Controller;

**supervisory authority:** In Hungary, the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH), which is responsible for ensuring the right to informational self-determination.

### **III. Data processing purposes, legal bases, data subjects and categories of personal data processed**

#### **III.1. Data processing related to core activities (providing services for spinal gymnastics and other musculoskeletal complaints related to naturopathic treatments and related online training, examinations, consultations and advice)**

##### **III.1.1. Purpose of data processing and categories of data processed**

The Data Controller provides services for spinal gymnastics and other musculoskeletal complaints related to naturopathic treatments and related online training, examinations, consultations and advice and for the preparation, creation, definition, modification and performance of the contract for the use of the service, for the enforcement of claims and for maintaining contact, as well as for the purposes of Section 4 (1) of Act XLVII of 1997 on the Management and Protection of Personal Data Related to Health Care and Related Personal Data (Eüak. tv.). Based on points a), b), c) and e), the following categories of personal data are processed in order to promote the preservation, improvement and maintenance of health, to facilitate the effective medical treatment activities of the patient care provider, to monitor the health status of the data subject and to enforce patient rights:

Processed personal data:

1. Name of the data subject,
2. Name of the data subject's mother,
3. Place and date of birth of the data subject,
4. Social security identification number (TAJ) of the data subject,
5. Place of residence of the data subject,
6. Telephone number of the data subject,
7. E-mail address of the data subject,
8. Name and contact details of the data subject's closest relative,
9. Marital status of the data subject,
10. Name of the data subject's workplace, name of the sports club

Processed health data:

11. Current musculoskeletal and general health status of the data subject, complaints, problems, life history events, contact details of the patient with his/her family related information – communicated by him/her,
12. Data on the data subject's previous (elsewhere) treatments, diagnoses, final reports.
13. Results of clinical neurological, musculoskeletal and other examinations.
14. Results of neurological, musculoskeletal tests, Complaints made by the data subject,
15. Results of the consultation or name of the therapeutic method, notes made during these

Categories of data subjects: Natural person using the service.

### **III.1.2. Legal basis and duration of data processing:**

**Legal basis of data processing** The legal basis for data processing in relation to data categories 1-10 is the performance of the contract or taking steps prior to concluding a contract (Article 6 (1) b) of the GDPR and Article 6 (1) c) of the GDPR, subject to Section 28 (1) of the Eüak.tv. The legal basis for data processing in relation to data categories 11-15 is the establishment of a medical diagnosis, the provision of health or social care or treatment (Article 9 (2) point h) of the GDPR, subject to paragraphs 9 (1)-(2) of the Eüak.tv.

The data controller is subject to a professional secrecy obligation in relation to the data it processes. The provision of health and personal identification data by the data subject - with the exception of data categories 1-3 and 5, or mandatory data categories 1-5 for the provision of health care, and with the exception of those set out in Section 13 of the Eüak.tv. - is voluntary.

In the case of using the service online, the service is provided by Zoom Video Communications, Inc. (4th Floor, The Place, 174-177 High Holborn, London, WC1V 7AA, United Kingdom, +44.800.368.7314 or +44.20.7039.8961 | info@zoom.us) service, which provides end-to-end encryption. Zoom's data processing information is available here: <https://zoom.us/privacy>

**Duration of data processing:** The data controller shall retain the health documentation for at least 30 years from the date of data collection, pursuant to Section 30 (1) of the Data Protection Act.

## **III.2. Data processing by the Data Controller related to invoicing and the preservation of accounting documents**

### **III.2.1. Purpose of data processing and categories of data processed**

The Data Controller processes the following categories of personal data for the purpose of issuing and preserving accounting documents (invoices) for the services provided by it - based on a legal obligation:

1. Billing data (Name of the Data Subject, billing address);

Categories of Data Subjects: Natural person using the service.

### **III.2.2. Legal basis and duration of data processing:**

The legal basis for data processing is Article 6 (1) (c) of the GDPR, the data processing is necessary for the data controller to fulfill its legal obligation specified in Section 169 (2) of the Accounting Act. The data controller is obliged to provide data to the National Tax and Customs Office regarding the invoices issued pursuant to Act CXXVII of 2007 on Value Added Tax and Annex No. 10, points 1, 4 and 6.

Duration of data management: The data retention period is determined by Section 169 (2) of the Accounting Act at least 8 years.

## **III.3. Processing of data provided in the appointment booking form operated on the Data Controller's website**

### **III.3.1. Purpose of data management and categories of data managed**

The Data Controller processes the following categories of personal data for the purpose of booking an appointment for the provision and use of services:

1. Name provided by the data subject

2. Data subject's e-mail address
3. Telephone number

Categories of data subjects: Natural person using the service.

### **III.3.2. Legal basis and duration of data processing:**

The legal basis for data processing is the consent of the data subject (Article 6 (1) (a) of the GDPR), in the case of using the service related to the data controller's core activity, the performance of a contract, or taking steps prior to concluding a contract (Article 6 (1) (b) of the GDPR, Act 13/A (1) (b)).

**Duration of data processing:** The data subject's contact data based on consent is processed until the consent is withdrawn, and in the case of using the service related to the data controller's core activity, for the period specified in the regulations for health documentation (30 years).

## **III.4. Data processing during purchases via the website**

### **III.4.1. Purpose of data processing and categories of processed data**

In order to ensure the smooth processing of purchases through the website operated by it, the Data Controller processes the following categories of personal data:

1. Name provided by the data subject (surname and first name)
2. Data subject's e-mail address
3. Billing address provided by the data subject
4. Data subject's telephone number
5. optionally; company name, tax number

Categories of data subjects: Natural person using the service

### **III.4.2. Legal basis and duration of data processing**

The legal basis for data processing is the data subject's consent (Article 6 (1) a) of the GDPR), and the fulfillment of the data controller's obligations specified in the law (Article 5 (1) b) of the Act on Informational Self-Determination and Freedom of Information (Infotv.) point.), the data processing is necessary for the performance of a contract to which the data subject is a party, or for taking steps at the data subject's request prior to entering into a contract (GDPR Article 6 (1) (b) point, Ektv. 13/A (1)-(5) paragraphs.).

**Duration of data processing:** Data processing lasts until the termination of the legal relationship between the data controller and the data subject, or in the case of complaint handling and claims, for 5 years after the contract.

Accounting documents are an exception, since these data must be retained for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting. Accounting documents directly and indirectly supporting accounting settlements (including general ledger accounts, analytical and detailed records) must be retained in a legible form for at least 8 years, retrievable by reference to the accounting records.

## **III.5. Data processing during the processing of opinions and comments**

### **III.5.1. Purpose of data processing, categories of data processed**

In order to develop and promote services, document evaluations, and distinguish visitors/customers, the Data Controller processes the following categories of personal data:

1. Username and/or name
2. Image (optional)
3. Text of the evaluation

Scope of data subjects: All data subjects who write/publish comments and opinions

### **III.5.2. Legal basis and duration of data processing**

**Legal basis for data processing:** the data subject's consent (GDPR Article 6 (1) (a))

**Duration of data processing:** Until consent is withdrawn. Consent can be withdrawn at any time, but it does not affect prior lawful data processing.

### III.6. Processing of Cookie and IP address data on the Data Controller's website

#### III.6.1. Purpose of data processing and categories of data processed

The Data Controller processes data resulting from the use of cookies (hereinafter referred to as “cookies”) in relation to the User who displays the website in their internet browser.

A cookie is data that the visited website sends to the visitor’s browser (in the form of a variable name-value pair) so that it can store it and later be loaded by the same website. Later, with every HTTP(S) request, the browser also sends this data to the server, thereby modifying the data on the user’s device.

The Data Controller uses the Google Analytics service (Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America) to analyze website traffic. The Data Controller processes the IP address recorded during the Data Subject's visit in an anonymized (masked) manner within the framework of the Google Analytics service, which means that - before any kind of storage or processing operation takes place - it performs the anonymization/masking of IP addresses. The anonymized data is no longer suitable for identifying the Data Subject, so this data is not considered personal data under the GDPR. The Data Controller uses the service to analyze the website traffic to organize the device category used by the Users, browser usage, and to measure the website traffic (visit time, session length, bounce rate). Google Analytics retains the data in an anonymized form for 24 months as described above. (For more information about Google's data protection principles: <https://www.google.hu/intl/hu/policies/privacy/>, for more information about Google Analytics anonymization: <https://support.google.com/analytics/answer/2763052> ).

The Data Controller places a cookie (cookie or data package) on the Data Subject's IT device, as specified in the table below - related to the Google Analytics service - which, due to the anonymization/masking of IP addresses, is no longer suitable for identifying the Data Subject as anonymized data, so this data does not qualify as personal data under the GDPR.

Name of the Cookie	What data do you have access to?	Lifetime of zhe Cookie	Information about the function of cookies, the purpose of data processing
_ga	The data is collected through an anonymous identifier. They help the website owner analyze the performance of the website. They provide information on the number of users, the number of visits to each page, the time spent on the website, the duration, the device used to visit (mobile, desktop, tablet, screen size, operating system type), the geographical location of the visit at a maximum city level, and the frequency of visits (what proportion of returning or new visits there are).	2 years	<b>The _ga cookie is used to distinguish individual users (or more precisely, individual browsers).</b> It contains a randomly generated number as a value (e.g.: GA1.2.255322818.1517541613). It can be used to create long-term statistics on users' visits to the website. It is included in each page request of the website.

_gat	The data is collected through an anonymous identifier. They help the website owner analyze the performance of the website. They provide information on the number of users, the number of visits to individual pages, the time spent on the website, the duration, the device used to visit (mobile, desktop, tablet, screen size, operating system type), the geographical location of the visit at a maximum city level, and the frequency of visits (what proportion of returning or new visits are there).	1 day	<b>The _gat cookie, according to Google, is used to control request frequency - limiting data collection on high-traffic websites.</b> It is included in every page request for the website.
_gid		1 day	Cookie name associated with Google Universal Analytics. Stores and updates a unique identifier for each page visited.

The User can delete cookies from their own computer or set their browser to prohibit the use of cookies. You can find information about cookie settings for the most popular browsers at the following links

Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>

Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>

Microsoft Internet Explorer 11:

<http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11>

Microsoft Internet Explorer 10:

<http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7>

Microsoft Internet Explorer 9:

<http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9>

Microsoft Internet Explorer 8:

<http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8>

Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>

Safari: <https://support.apple.com/hu-hu/HT201265>

#### **IV. Data transfer operations carried out by the Data Controller within the framework of its activities**

##### **IV.1. Data transfer based on an official or court request, or procedures initiated by the Data Controller**

The Data Controller shall transfer personal data on an ad hoc basis if an authority, court, other body, organization or person with public authority authority requires the transfer of data with an appropriate legal reference for the Data Controller.

The Data Controller shall also be entitled to transfer personal data on an ad hoc basis if the Data Controller is the initiator of a court, non-litigation or official procedure, and the initiation of the procedure shall be

carried out exclusively in accordance with the data processing provisions of the relevant law. The Data Controller shall transfer the most necessary data sets that are absolutely necessary for the conduct of the procedure.

#### IV.2. Forwarding of invoice data to the National Tax and Customs Office

The data controller is obliged to provide data to the National Tax and Customs Office with regard to the invoices issued, pursuant to Act No. 257/G. of 2007 CXXVII on Value Added Tax and Annex No. 10, points 1, 4 and 6. The legal basis for data processing is the fulfillment of a legal obligation pursuant to Article 6(1)(c) of the GDPR, which is defined in the law of the Member States in accordance with Act No. 257/G. of 2007 CXXVII on Value Added Tax and Annex No. 10, points 1, 4 and 6.

#### IV.3. Data transmission to the Electronic Health Service Area

According to Section 35/F. of the Eüak.tv., the data controller is obliged to provide data to the Eüak.tv. In order to make the data accessible for the purposes set out in Section 4 (1) a)-c) or Section 4 (2) f) the operator shall make the following data about the data subject managed by it available to the operator through the EESZT:

- the social security number of the data subject or, in the absence thereof, another identifier, date of birth, gender, citizenship; in the case of a prescription and referral transmitted via the EESZT, other personal identification data included in the prescription and referral, the identifier of the data subject formed in the EESZT;
- the designation, type, date and duration of the care event, as well as other data and documents specified in a ministerial decree, and
- the designation of the healthcare provider providing the care event, its identifier formed in the EESZT, and the EESZT identifier of the person providing the care event or contributing to it.

The legal basis for the data transfer is Article 9 (2) h) of the GDPR and Eüak.tv. Section 7 (2) b).

### V. Data processing by data processors in connection with the activities of the Data Controller

During its data processing activities, the Data Controller uses the following data processors on the basis of a contract. The transfer of data to the data processors specified in this information may be carried out without the specific consent of the data subjects. The data processors may not make independent decisions, they are entitled to act solely in accordance with the contract concluded with the Data Controller and the instructions received.

Data processor details:	Description of data processing activity:
<b>Nethely Kft.</b> Web: <a href="http://www.nethely.hu">www.nethely.hu</a> GDPR: <a href="https://www.nethely.hu/files/Nethely_kft_adatvedelmi_es_adatkezelesi_szabalyzat.pdf">https://www.nethely.hu/files/Nethely_kft_adatvedelmi_es_adatkezelesi_szabalyzat.pdf</a>	The data processor provides hosting services to the Data Controller and stores data related to this activity.
<b>Szamlazz.hu számlázóprogram</b> KBOSS.hu Kft. Registered office: 1031 Budapest, Záhony utca 7. Service provider tax number: 13421739-2-41 Company registration number: 01-09-303201 Email: <a href="mailto:info@szamlazz.hu">info@szamlazz.hu</a>	The data processor provides invoicing services to the data controller, within the framework of which it stores and, if necessary, forwards the invoice data to the tax authority in relation to data processing III.4.
<b>Meta Platforms Ireland Ltd.</b> web: <a href="http://www.facebook.com">www.facebook.com</a> , <a href="http://www.instagram.com">www.instagram.com</a> GDPR: <a href="https://www.facebook.com/policy.php/">https://www.facebook.com/policy.php/</a>	The data processor publishes posts and comments and stores the data in relation to the data processing operations set out in Section III.5.

<b>Tik Tok</b> web: <a href="http://www.tiktok.com">www.tiktok.com</a> GDPR: <a href="https://www.tiktok.com/legal/page/eea/privacy-policy/hu-HU">https://www.tiktok.com/legal/page/eea/privacy-policy/hu-HU</a>	The data processor publishes posts and comments and stores the data in relation to the data processing operations set out in Section III.5.
<b>Pinterest</b> Web: <a href="http://www.pinterest.com">www.pinterest.com</a> GDPR: <a href="https://policy.pinterest.com/hu/privacy-policy">https://policy.pinterest.com/hu/privacy-policy</a>	The data processor publishes posts and comments and stores the data in relation to the data processing operations set out in Section III.5.
<b>YouTube</b> web: <a href="http://www.youtube.com">www.youtube.com</a> GDPR: <a href="https://policies.google.com/privacy?hl=hu">https://policies.google.com/privacy?hl=hu</a>	The data processor publishes posts and comments and stores the data in relation to the data processing operations set out in Section III.5.
<b>Google Analytics</b> web: <a href="http://www.googleanalytics.com">www.googleanalytics.com</a> GDPR: <a href="https://analytics.google.com/analytics/web/provision/#/provision">https://analytics.google.com/analytics/web/provision/#/provision</a>	The data processor performs web analytics for the data controller and stores related data generated during the operation of the website.
<b>Automatic Inc.</b> Web: <a href="http://www.woocommerce.com">www.woocommerce.com</a> GDPR: <a href="https://automatic.com/privacy/">https://automatic.com/privacy/</a>	The data processor stores data generated in connection with the construction of the website (webshop).
<b>Divi</b> web: <a href="https://www.elegantthemes.com/">https://www.elegantthemes.com/</a> GDPR: <a href="https://www.elegantthemes.com/policy/privacy/">https://www.elegantthemes.com/policy/privacy/</a>	The data processor stores data generated in connection with the construction of the website.
<b>WordPress</b> Web: <a href="http://www.wordpress.com">www.wordpress.com</a> GDPR: <a href="https://automatic.com/privacy/">https://automatic.com/privacy/</a>	The data processor stores data generated in connection with the construction of the website.
<b>STRIPE Inc.</b> Web: <a href="http://www.stripe.com">www.stripe.com</a> GDPR: <a href="https://stripe.com/en-hu/privacy">https://stripe.com/en-hu/privacy</a>	The data processor stores payment-related data in relation to the data processing operations set out in Section III.4.

## VI. Storage and security of personal data

### VI.1. Handling of paper-based documents

Paper-based letters, consignments and other documents are kept in a locked room at the data controller's registered office, and only the data controller has access to them. Paper-based documents containing personal data can only be destroyed using a document shredder. The data controller is subject to a professional confidentiality obligation with regard to the data it processes.

### VI.2. Handling of personal data stored in an IT system

Only the Data Controller and data processors acting on the Data Controller's instructions can access electronically stored data. During data processing, the Data Controller implements the following technical and organizational measures in order to guarantee a level of data security appropriate to the level of risk:

- ensuring the confidentiality of access by user identification and managing permissions;
- only the data controller is authorized to enter and access the data;
- by ensuring a backup of the data, the data can be restored after a maximum of 24 hours.

## VII. Rights of data subjects

### VII.1. Deletion of personal data, withdrawal of consent to data processing

The Data Controller is obliged to delete the processed personal data if

- a) the data subject requests it or withdraws his/her consent, unless the GDPR allows further processing of the data;
- b) the purpose of the data processing has ceased to exist;
- c) the data subject objects to the data processing based on the legitimate interest of the Data Controller, unless the Data Controller is able to clearly demonstrate to the data subject the legitimacy of the data processing;
- d) the personal data were processed unlawfully by the Data Controller;
- e) the deadline for data processing has expired.

The data subject may submit a request for the deletion of his/her personal data, or if the Data Controller processes his/her personal data based on the data subject's consent, he/she may withdraw his/her consent to data processing at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal.

### **VII.2. Right to restriction of processing**

The Controller shall restrict the processing of personal data if

- a) the data subject disputes the accuracy of the personal data, in which case the restriction shall apply for the period necessary for the clarification;
- b) the processing is unlawful, but the data subject opposes the erasure of his/her data and requests the restriction of use;
- c) the purpose of the processing has ceased, but the data subject requests the processing of his/her data for the establishment, exercise or exercise of legal claims;
- d) the data subject has objected to the processing.

The data subject shall have the right to obtain from the Controller, at his/her request, restriction of processing of personal data where one of the above conditions applies.

### **VII.3. Right to rectification**

The data subject shall have the right to obtain from the Controller, at his/her request, the rectification of inaccurate personal data concerning him/her without undue delay. The Data Controller is obliged to clarify and correct the data it has processed incorrectly, even without the specific request of the data subject.

### **VII.4. Right to object**

The data subject has the right to object at any time to the processing of his or her personal data if the processing by the Data Controller is based on the legitimate interests of the Data Controller. In the event of an objection, the Data Controller may only continue to process the data subject's data if it proves that its legitimate interests override those of the data subject.

### **VII.5. Right of access of the data subject**

The data subject has the right to receive feedback from the Data Controller, upon request, as to whether his or her personal data is being processed ("right of access"). The Data Controller shall provide specific information on the purposes of data processing, the categories of data, the recipients affected by the transfer, the duration of data processing, the exercise of data subject rights, the lodging of a complaint with the supervisory authority, and the source of the data at the request of the data subject. The Data Controller shall generally be obliged to provide the data subject with comprehensive and comprehensible information on the relevant circumstances related to data processing. If the data subject requests it, the Data Controller shall provide a copy of the personal data.

### **VII.6. Procedure for submitting and handling requests from data subjects**

Data subjects may submit their requests regarding the processing of their personal data orally (in person) or in writing (in person, by e-mail, by post) to the Data Controller's contact details.

The Data Controller shall inform the data subject without undue delay, and no later than one month from the receipt of the request, of the measures taken in response to the request and the requested information. The Data Controller shall provide the information in the manner requested by the data subject.

If the identity of the person submitting the request is in doubt, the Data Controller may request additional information necessary to confirm the identity of the data subject. The Data Controller shall send a letter requesting additional information within 5 working days of receipt of the request.

As a general rule, the Data Controller shall not charge a separate fee for information and measures related to the data subject's rights, except in exceptional cases where the request is clearly unfounded or the data subject requests multiple copies of the data and the fulfillment of the request entails particularly significant administrative costs.

## **VIII. Remedies for the data subject**

### **VIII.1. Complaint to the National Authority for Data Protection and Freedom of Information**

If the data subject believes that the Data Controller has not been able to resolve his/her request regarding his/her personal data in a satisfactory manner, or if he/she considers that he/she has suffered a serious infringement of his/her rights in relation to the processing of his/her personal data, or if the Data Controller does not comply with the provisions of the GDPR during the processing of the data, he/she is entitled to file a complaint with the National Authority for Data Protection and Freedom of Information.

The supervisory authority to which the complaint was submitted is obliged to inform the customer about the procedural developments related to the complaint and its outcome.

Contact details of the National Authority for Data Protection and Freedom of Information:

- registered office: 1055 Budapest, Falk Miksa utca 9-11.
- postal address: 1374 Budapest, Pf. 603.
- phone: +36 (1) 391-1400
- fax: +36 (1) 391-1410
- e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- website: [www.naih.hu](http://www.naih.hu)

### **VIII.2. Right to appeal to court**

In the event of unlawful data processing experienced by the data subject, the data subject may initiate a civil lawsuit against the Data Controller. The trial falls within the jurisdiction of the court. The lawsuit may also be initiated – at the choice of the data subject – before the court of his or her place of residence.

### **VIII.3. Legislation used**

In preparing the information, we have taken into account the following legislation:

- Act CXII of 2011 – on the right to informational self-determination and freedom of information (hereinafter: Infotv.)
- Act CVIII of 2001 Act – on certain aspects of electronic commerce services and information society services (in particular Section 13/A)
- Directive 2002/58/EC of 12 July 2002 on the processing of personal data and the protection of privacy in the electronic communications sector (“Directive on privacy and electronic communications”)
- Act XLVIII of 2008 – on the basic conditions and certain restrictions of economic advertising (in particular Section 6)
- Act C of 2003 on electronic communications (in particular Section 155)
- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL