

# **BÁTOR TÁBOR FOUNDATION PRIVACY POLICY FOR SUPPORTERS**

## **1. GENERAL PROVISIONS AND CONTACTS**

Bátor Tábor Foundation (hereinafter referred to as: “**Bátor Tábor**”), with regard to its existing and potential supporters (hereinafter referred to as: “**Supporter**”) manages information considered to be “personal data” according to article 4 point 1 of the General Regulation 2016/679 of the EU („**GDPR**”). The present policy (hereinafter referred to as: “**Policy**”) provides information about the management of such personal data.

The registered seat of Bátor Tábor: 1135 Budapest, ReitterFerenc utca 46-48.

The registration number of Bátor Tábor: 01-01-0008659, registered by the Metropolitan Court

The phone number of Bátor Tábor: (+36 1) 302 8808

The email address of Bátor Tábor: [batortabor@batortabor.hu](mailto:batortabor@batortabor.hu)

The website of Bátor Tábor: [www.batortabor.org/hu](http://www.batortabor.org/hu)

The representative and their contact email of Bátor Tábor: Erna Kindli (batortabor@batortabor.hu)

Data protection officer of Bátor Tábor: dr. Adrienn Esztervári (a.esztervari@batortabor.hu)

## **2. UPDATING AND ACCESSING THE POLICY**

Bátor Tábor reserves the right to modify this Policy unilaterally, taking effect immediately after the modification, if necessary, with the prior information of the data subjects in time, with regard to limitations provisioned by the relevant legal regulations. The modification of the present data might take place especially in the case when it becomes necessary due to a change in legislation, a data protection authority practice, new activities resulting in the management of personal data, a newly discovered security risk, or the feedback from data subjects.

## **3. SPECIFIC DATA PROTECTION CONDITIONS**

In case of specific data management duties, specific data protection conditions may apply, of which the data subjects are advised, for instance prior to the request of their consent to the relevant data management operation.

## **4. THE SCOPE OF THE DATA MANAGED AND THE PURPOSES OF DATA MANAGEMENT**

The data subjects must provide the relevant personal data to Bátor Tábor in accordance with the relevant legal regulations at all times. Especially, they must have appropriate and informed consent or legal basis to provide the personal data. Bátor Tábor shall not be held responsible for any damage, loss or harm due to the failure of the data subjects to take responsibility or the breach of their statements.

In case a data management objective is necessary for the legitimate interests of Bátor Tábor or a third person, the interest pondering test to find the validity of the legal interest shall be made available by Bátor Tábor on one of the contacts above in case a request was submitted.

**Bátor Tábor explicitly calls the attention of the data subjects that the data subjects have the right for reasons relevant to their situation to protest against the management of their personal data based on legitimate interest at any time, including profiling based on the aforementioned provisions. In this case, Bátor Tábor shall not manage the data further, except for the case when they prove that data management is substituted by such coercive, legitimate reasons which have priority over the interests, rights and freedoms of the data subject, or which are related to putting forward, exercise or protect legal claims. In case the management of personal data is performed for direct marketing, the data subject has the right to protest at any time against the management of the data subject’s personal data for this purpose, including profiling, when it is connected to direct marketing. In case the data subject protests against the management of personal data for direct marketing, then the personal data cannot**

**be managed further for this purpose.**

The scope of data managed, the objectives of data management, the duration of data management and the circle of persons having access to the data shall be presented in the following table:

In case the duration of data preservation is provisioned as the limitation period of the Advisory requests, the act interrupting the period of data preservation shall prolong the data preservation period until the new date of the limitation period. The basis of the provision of the data preservation period in these cases is generally governed by Act V/2013 on the Civil Code (hereinafter referred to as: “**Civil Code**”).

In case somebody is not entitled to disclose a personal data individually, they are bound to obtain the consent of the given third party (e.g. the person whom they recommend for Bátor Tátor to invite to participate at their events), or guarantee another the legal basis for the disclosure of the data. With respect to this, the person disclosing the data shall consider whether it is necessary to obtain the consent of a third person in connection with the disclosure of the given personal data.

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The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights
<p><b>Donation on the website of Bátor Tábor:</b> <a href="http://www.batortabor.org/hu">www.batortabor.org/hu</a> (hereinafter referred to as: “Website”) by private persons</p> <p>Private persons willing to donate can fill in the form concerning donations on the Website.</p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the Supporter).</p> <p>The data subject is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In the lack of consent the data of the supporter data subjects cannot be managed.</p> <p>With regard to data management relevant to the accounting documents related to donations the personal data provided must be managed by Bátor Tábor based on Article 6. (1) c) of the GDPR (data management is necessary to fulfill legal obligations). The legal obligation of Bátor Tábor: data necessary to support accounting documents shall be preserved for 8 years based paragraph 169. § (2) of Act C/2000 on accounting (hereinafter referred to as: “Act on Accounting”).</p>	<p>Payment method (credit card/bank transfer/by post), frequency of donation (one-time/monthly/quarterly/half-year), the sum of the donation (in HUF/EUR/USD).</p> <p><b>In addition, personal data of the Donor:</b> surname, first name, email address, phone number (it is necessary to provide these data for the donation), city, zip code, street, house number, comment, content of the message.</p> <p><b>Further optional contributions in case of donations through the Élménykülönítmény program:</b> display of the name of the Donor and/or the sum offered among the supporters of the charity fundraising. In the lack of this contribution these data cannot be displayed on the Website related to the individual donations.</p>	<p>Data preservation time: the data are managed by Bátor Tábor until the withdrawal of the consent, in the lack of this, based on 6:22. § of the Civil Code up to <b>5 years</b> (civil claims have a statute of limitations of 5 years in general). Data necessary to support accounting documents shall be preserved for 8 years based paragraph 169. § (2) of the Act on Accounting.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights
<p><b>Donation on the website by corporations</b></p> <p>Corporations willing to donate can fill in the form concerning donations on the Website.</p>	<p>GDPR Article 6. (1) f) (necessary for the purposes of legitimate interest of Bátor Tábor and the persons involved in donations).</p> <p>Legitimate interest: reception of donations and their distribution to the entitled parties.</p>	<p>Payment method (credit card/bank transfer/by post), frequency of donation (one-time/monthly/quarterly/half-year), the sum of the donation (in HUF/EUR/USD).</p> <p><b>In addition, personal data of the contact person of the Donor:</b> surname, first name, email address, phone number (it is necessary to provide these data for the donation), position, comment, content of the message.</p> <p><b>In addition, data of the donating corporation:</b> company number, registered seat, tax registration number.</p>	<p><b>Data preservation time:</b> with regard to the persons proceeding in the name of companies, in case of the practicing of the right to protest, Bátor Tábor shall erase the data of the data subject <b>within 30 days</b> from the receipt of such request, in the lack of this, based on 6:22. § of the Civil Code up to <b>5 years</b> (civil claims have a statute of limitations of 5 years in general). Data necessary to support accounting documents shall be preserved for 8 years based paragraph 169. § (2) of the Act on Accounting.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>
<p><b>Request for information on the website on various donation, volunteering or camp participation opportunities by private persons.</b></p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the data subject).</p> <p>The data subject is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In the lack of consent the request for information cannot be fulfilled.</p>	<p><b>Personal data of the data subject:</b> surname, first name, email address.</p>	<p><b>Data preservation time:</b> the data are managed by Bátor Tábor until the withdrawal of the consent, in the lack of this, until the fulfilment of the request for information.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department, staff of the volunteer organization and camp participant organization.</p>

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights
<p><b>Application to the Élménykülönítmény program on the website elmenykulonitmeny.hu and donation during participation in the program</b></p> <p>Élménykülönítmény is the charity community of Bátor Tábor established to help severely ill children, and within the program individuals and teams fulfil a challenge, and raise funds for Bátor Tábor during this activity.</p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the Supporter). In case customs in sports also contain health data: GDPR Article 9. (2) a) (the explicit consent of the Supporter).</p> <p>The data subject is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In lack of consent, the Donor cannot participate in the Élménykülönítmény program of Bátor Tábor.</p> <p>With regard to data management relevant to the accounting documents related to donations the personal data provided must be managed by Bátor Tábor based on Article 6. (1) c) of the GDPR (data management is necessary to fulfill legal obligations). The legal obligation of Bátor Tábor: data necessary to support accounting documents shall be preserved for 8 years based paragraph 169. § (2) of Act C/2000 on accounting (hereinafter referred to as: “<b>Act on Accounting</b>”).</p>	<p><b>Personal data of the applicant:</b> surname, first name, email address, phone number, city, zip code, street, house number, place of work, position, T-shirt size.</p> <p>In addition, the profile picture, customs in sports, introductory text provided voluntarily by the data subject.</p>	<p>Data preservation time: the data are managed by Bátor Tábor until the withdrawal of the consent, in the lack of this, based on 6:22. § of the Civil Code up to <b>5 years</b> (civil claims have a statute of limitations of 5 years in general). Data necessary to support accounting documents shall be preserved for 8 years based paragraph 169. § (2) of the Act on Accounting.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Élménykülönítmény project.</p>

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The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights
<p><b>Thank you letter, email and phone call sent to the supporters of the fundraisers participating in the Élménykülönítmény program (above: Donors) (and by this, supporters of Bátor Tábor)</b></p>	<p>GDPR Article 6. (1) f) (data management necessary for the purposes of legitimate interest of Bátor Tábor).</p> <p>Legitimate interest: thank you following the support of Bátor Tábor.</p>	<p>name, address, e-mail address, phone number</p>	<p><b>Data preservation period:</b> On the data subject's request the data shall be erased (until withdrawal).</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>
<p><b>Using visiting cards to keep contact</b></p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the data subject).</p> <p>The data subject is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In lack of consent, Bátor Tábor shall not preserve the visiting card of the data subject.</p>	<p>Contact data provided on the visiting card.</p>	<p><b>Data preservation time:</b> the data are managed by Bátor Tábor until the withdrawal of the consent, in the lack of this, during the contact.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>
<p><b>Sending invitations for events in email</b></p>	<p>GDPR Article 6. (1) f) (data management necessary for the purposes of legitimate interest of Bátor Tábor).</p> <p>Legitimate interest: promoting the events of Bátor Tábor.</p>	<p><b>In case of events,</b> the contact details of the data subjects intended to be invited by Bátor Tábor: the name of the participants, and if applicable, the name of the corporation represented, other data provided by them relevant to their participation (e.g.: time of arrival, etc.).</p>	<p><b>Data preservation period:</b> On the data subject's request the data shall be erased (until withdrawal).</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights
<p><b>Electronic newsletter about the current events of Bátor Tábor, providing information about the activities of Bátor Tábor and the manner of using donations, camp news and fundraising messages.</b></p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the data subject), and paragraph 6. § (1) of Act XLVIII./2008 on the fundamental conditions and certain limitations of business advertising activities, the prior, obvious and explicit consent of the data subject.</p> <p>The declaration of consent can be withdrawn at any time, without space or time limitations. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p>	<p>The name, email address of the recipient and information about whether the recipient opened the letter, and if there was a link in the newsletter, whether it was opened.</p>	<p><b>Data preservation time:</b> the data are managed by Bátor Tábor until the withdrawal of the consent.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>
<p><b>Alumni newsletter of the charity athletes of Élménykülönítmény</b></p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the data subject).</p> <p>The data subject is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In lack of consent, Bátor Tábor cannot send newsletters.</p>	<p>The charity athlete's name, email address, address.</p>	<p><b>Data preservation time:</b> the data are managed by Bátor Tábor until the withdrawal of the consent.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>



The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights
<p><b>Sending fundraising letters by post.</b></p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the data subject), and paragraph 6. § (1) of Act XLVIII./2008 on the fundamental conditions and certain limitations of business advertising activities, the prior, obvious and explicit consent of the data subject.</p> <p>The declaration of consent can be withdrawn at any time, without space or time limitations. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p>	<p>The recipient's name and postal address.</p>	<p><b>Data preservation time:</b> the data are managed by Bátor Tábor until the withdrawal of the consent.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>
<p><b>Online data collection related to participation at our Events (e.g. online registration for the Event, registration for remote bidding)</b></p>	<p>GDPR Article 6. (1) a) (the volunteer consent of the data subject). The data subject is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In the lack of consent, the Participant cannot register online, bid as a person not being present, etc.</p>	<p>The Participant's name, email address, phone number, data relevant to participation and bidding (e.g. name, number of the item, maximum bid). In case a Participant provides not their, but other's personal data to Bátor Tábor, the Participant is bound to care for, and is solely responsible for the observation of legal regulations, and to obtain the volunteer consent of the data subject based for the transmission of their personal data. For any damage, loss or harm due to the failure of the performance of the duties listed above, Bátor Tábor shall not be held responsible. During the management of the personal data of these third persons, Bátor Tábor will not examine the lawfulness of the transmission of the personal data of these data subjects to the foundation, the validity of the data subject's consent, for these the Participant transmitting the personal data of the third person shall be solely held responsible.</p>	<p><b>Data preservation time:</b> the data are managed by Bátor Tábor until the withdrawal of the consent, however maximum until 30 days following the end of the Event.</p> <p><b>Access right within the organization of Bátor Tábor:</b> staff of the Fundraising department.</p>

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## 5. PERSONS ENTITLED TO DATA PROCESSION

For the performance of tasks related to data management activities, Bátor Tábor uses the following contractual partners. The contractual partner proceeds as a so-called “data processor”, manages the data specified in the present Policy in the name of Bátor Tábor.

Bátor Tábor can only use such data processors who provide appropriate guarantees - with special regard to expertise, reliability and capacities, so that they perform the technical and organizational measures ensuring the fulfillment of GDPR requirements, including the security of data management. Specific tasks and responsibilities of the data processor are governed by the contract concluded between Bátor Tábor and the data processor. Following the performance of the data management in the name of Bátor Tábor the data manager, according to the choice of Bátor Tábor returns or deletes personal data, except for the case when an EU or member state law relevant to the data processor stipulates their storage.

The data processor	Activity
<b>Wanadis Kereskedelmi és Szolgáltató Kft.</b>  1112 Budapest, Budaörsi út 153. Court registration number: 01-09-885144 Tax registration number: 14020362-2-43 06-1-248-0678 <a href="mailto:info@maileon.hu">info@maileon.hu</a>	Sending electronic letters in the name of Bátor Tábor and providing relevant statistics (whether the recipient opened the letter, and if there was a link in the newsletter, whether it was opened) to Bátor Tábor.
<b>Givergy Ltd,</b>  registered in: England & Wales, 04220813, Rosedale Studios, Rosedale Road, Richmond, TW9 2SX kapcsolattartó: John Roberts, Director of Business Development & Auctioneer T: +44 (0) 20 3319 3936 M: +44 (0)7732 656 222 E-mail: <a href="mailto:john.roberts@givergy.com">john.roberts@givergy.com</a> W: <a href="http://www.john-roberts.com">www.john-roberts.com</a>	Sending electronic letters and text messages in the name of Bátor Tábor for donors registered on the online platform of the charity event. Managed data: name, phone number, e-mail address.

<p><b>LOGAN ICT Services</b></p> <p><b>operating as: AUCTION-EXPERTS</b>  <b>registered address:</b> Céramiquelaan 71  1031 KG Amsterdam  <b>telephone:</b> +31881919000  <b>e-mail:</b> info@auction-experts.com  <b>VAT no:</b> NL808454328B01  <b>CoC no:</b> 37084648</p>	<p>Sending electronic letters and text messages in the name of Bátor Tábor for donors registered on the online platform of the charity event. Managed data: name, phone number, e-mail address.</p>
<p>Microsoft Ireland Operations Limited,  Attn: Data Protection Officer, One Microsoft Place,   South County Business Park,  Leopardstown, Dublin 18, Ireland.  Telephone: +353 1 706 3117.</p> <p><a href="#">Microsoft Privacy Statement - Microsoft privacy</a></p>	<p>Online data collection related to participation at our events and programs. Managed data: name, phone number, e-mail address.</p>

## 6. DATA TRANSFER FOR OTHER DATA MANAGERS

Bátor Tábor shall transfer the personal data to the following corporation not listed above.

These companies shall proceed as data managers, i.e. individually or jointly with others may define the objective of the collection of personal data, take and execute decisions relevant to data management (including the tool), or make them executed by the data processor used by them. Recipients of the data transfer shall proceed as independent data managers during their activities, according to their own data management conditions; with regard to these, Bátor Tábor is not authorized to supervise. The Donor can receive further information about data management performed by them from these corporations.

Recipient of the data transfer	Activity
<b>Barion</b>	Performing, authorizing online payment transactions through the Internet, checking and preventing payment frauds.

Recipient of the data transfer	Activity
Barion has been developed and is operated by Barion Payment Zrt.  Registered seat: H-1117, Budapest, Infopark sétány 1. Court registration number: 01-10-048552 NAIH-73794/2014	Scope of data managed: buyer's name, phone number, email address, sum, date and time of the transaction, IP address, invoicing address, delivery address.  Legal basis of the data transfer: GDPR Article 6. (1) b) - data management is necessary to fulfil the contract between the data (donation)

## 7. **DATA SAFETY MEASURES**

Bátor Tábor keeps printed materials containing personal data of Camp participants in a locked cabinet. Access to online stored data is limited within the organization, it is protected by password and only those teams work with the data for the work of whom it is absolutely necessary. The internal network is protected against external attacks by a firewall.

## 8. **RIGHTS AND LEGAL REMEDIES OF THE DATA SUBJECT**

### 8.1 **Data protection rights and legal remedies**

Data protection rights and legal remedies of data subjects are contained by the relevant GDPR provisions in detail (with special regard to articles 15., 16., 17., 18., 19., 20., 21., 22., 77., 78., 79., 80. and 82. of the GDPR). The following summary contains the most important provisions, and Bátor Tábor provides information to data subjects about their rights and legal remedies relevant to data management accordingly.

Bátor Tábor informs the data subject about measures following their request without unsubstantiated delay, but in any event within one month following the data subject's request relevant to the exercise of their rights (see: articles 15-22. of the GDPR). If necessary, taking into consideration the complexity of the request and the number of requests, the deadline can be postponed by another two months. Bátor Tábor shall inform the data subject about the postponement of the deadline by stipulating the reasons of the delay within one month from the receipt of the request.

Information shall be given in writing or in another manner, including, but not limited to electronically. An oral information can also be given to the data subject's request, in case the identity of the data subject was verified otherwise. In case the data subject submitted their request electronically, if possible, the information shall be given electronically, unless the data subject requests otherwise.

In case Bátor Tábor does not take measures following the data subject's request, they shall inform the data subject without delay, but within one month from the receipt of the request the latest about the reasons of the failure of taking measures and that the data subject can submit a complaint at a supervisory authority and may seek legal remedy in court.

### 8.2 **The data subject's access rights**

(1) The data subject has the right to receive feedback from Bátor Tábor regarding the fact whether the procession of their personal data is in progress. In case such data processing in progress, the data subject is entitled to have access to their personal data and the following information:

- a) the objectives of data management;
- b) categories of the personal data concerned;
- c) categories of the recipient(s) to whom Bátor Tábor has disclosed or will disclose personal data, with special regard to third country recipients, and international organizations;
- d) if relevant, the planned duration of the storage of the personal data, or if it is not possible, the

- e) conditions of stipulating such a period;
  - e) the right of the data subject that they can request Bátor Tábor to amend, delete or restrict the management of their data, and protest against the management of such personal data;
  - f) the right to submit a complaint to a supervisory authority; and
  - g) if the data was not collected about the data subject, any available information regarding their source;
  - h) the fact of automated decision-making (GDPR Article 22 (1) and (4)), including profiling, and at least in these cases conspicuous information about the logic applied and what significance such data management has, and what consequences it may have on the data subject.
- (2) In case personal data are forwarded to a third country, the data subject has the right to receive information about the appropriate guarantees regarding forwarding.
  - (3) The copy of the personal data constituting the subject of data management is made available to the data subject by Bátor Tábor. For any further copies requested by the data subject Bátor Tábor may charge a reasonable fee, based on the administrative costs. In case the data subject submitted their request electronically, the information shall be given to them in a widely used electronic format, unless the data subject requests otherwise.

### **8.3 The right to rectification**

The data subject shall have the right that Bátor Tábor on their request rectifies the inaccurate personal data concerning them without delay. The data subject is entitled to request the completion of incomplete personal data, among others, via supplementary declaration.

### **8.4 Right to erasure (“right to be forgotten”)**

- (1) The data subject has the right that on their request Bátor Tábor erases their personal data without unsubstantiated delay in case of one of the following reasons:
  - a) the personal data are not need anymore for the purpose they were collected or managed in any other manner by Bátor Tábor;
  - b) the data subject withdraws their consent constituting the basis of data management, and the data management has no other legal basis;
  - c) the data subject protests against the management of their data and in the given case there is no legal reason for data management with priority;
  - d) personal data were managed unlawfully;
  - e) the personal data shall be erased by Bátor Tábor to perform a legal requirement of the EU or a member state; or
  - f) the collection of personal data was related to the offer of services relevant to the information society.
- (2) In case Bátor Tábor disclosed the personal information, and is obliged to erase them in accordance with the aforementioned facts, by taking into consideration accessible technology and the costs of feasibility, shall take the reasonably expectable measures, including technical measures, so that they inform data managers managing the data that the data subject has initiated the erasure of the links to the relevant personal data or the copy of such personal data and any copies.
- (3) Paragraph (1) and (2) are not to be applied, in case data management is necessary, among others:
  - a) to exercise the right of freedom of speech and access to information;
  - b) to perform a legal requirement of the EU or a member state applicable to Bátor Tábor provisioning the management of personal data;
  - c) for archiving for the sake of public interest, scientific or historical research purposes or statistical purposes, in case the right mentioned in paragraph (1) would possibly render data management impossible or risk it substantially; or
  - d) to establish, exercise or defend legal claims.

### **8.5 The right to the restriction of data management**

- (1) The data subject has the right that on their request Bátor Tábor erases their personal data without

unsubstantiated delay in case of one of the following reasons:

- a) the data subject debates the accuracy of the personal data, and in this case the restriction concerns the period which allows Bátor Tátor to check the accuracy of the personal data;
  - b) data management is unlawful, and the data subject opposes the erasure of personal data, and instead requests the restriction of their use;
  - c) Bátor Tátor does not need the personal data anymore for data management, however the data subject needs them to put forward, exercise or protect legal claims; or
  - d) the data subject protested against data management; in this case restriction concerns the period until it is found whether the legitimate interests of Bátor Tátor have priority over the legitimate interests of the data subject.
- (2) In case data management, due to paragraph (1) is subject to restriction, such personal data, except for storage can be managed only with the data subject's consent, or to forward, exercise or protect legal claims, or to protect the rights of another natural or legal person, or for the important public interest of the EU or any member state.
  - (3) Bátor Tátor informs the data subject on the request of whom data management was restricted about the lifting of the restriction in advance.

## **8.6 Obligation of information for the correction or erasure of the personal data, and for the restriction of data management**

Bátor Tátor shall inform every addressee about all the corrections, erasures or data management restrictions to whom or which they disclosed the personal data, except in case it is rendered impossible, or needs disproportionately huge effort. The data subject, on their request are informed about these addressees.

## **8.7 Right to data portability**

- (1) The data subject has the right to receive the personal data concerning them, disclosed to Bátor Tátor in a structured, generally used, machine-readable format, and also has the right to forward these data to another data manager without Bátor Tátor hindering it, in case:
  - a) the data management is based on consent or contract; and
  - b) the data management is done in an automatized manner.
- (2) Exercising the right to the portability of data in accordance with paragraph (1) the data subject has the right to request, if it is technically feasible, the direct forwarding of the personal data between data managers (thus Bátor Tátor and other data manager).
- (3) Practicing the aforementioned rights cannot infringe the provisions regarding the right to erasure ("right to be forgotten"), and this right cannot affect adversely the rights and freedoms of others.

## **8.8 Right to protest**

- (1) **The data subject has the right that for reasons relevant to their situation they protest against the management of their personal data based on legitimate interest at any time, including profiling. In this case, Bátor Tátor shall not manage the data further, except for the case when they prove that data management is substituted by such coercive, legitimate reasons which have priority over the interests, rights and freedoms of the data subject, or which are related to putting forward, exercise or protect legal claims.**
- (2) **In case the management of personal data is performed for direct marketing, the data subject has the right to protest at any time against the management of the data subject's personal data for this purpose, including profiling, when it is connected to direct marketing.**
- (3) **In case the data subject protests against the management of personal data for direct marketing, then the personal data cannot be managed further for this purpose.**
- (4) With regard to the use of services related to the information society, and deriving from the

2002/58/EC directive, the data subject can exercise their right to protest with the help of automated tools based on technical requirements.

- (5) In case the management of personal data is performed for the objective of scientific or historic research, the data subject has the right to protest for reasons relevant to their own situation against the management of the data subject's personal data, except for the case when the data management is necessary for the performance of a task for the public interest.

### **8.9 Right to make a complaint at the supervisory authority**

The data subject has the right to make a complaint at a supervisory authority, especially in the member state according to their usual residence, workplace, or the supposed infringement of rights, in case the data subject considers the management of personal data of the data subject infringes the provisions of the GDPR. In Hungary, the authority responsible is the following: Hungarian National Authority for Data Protection and Freedom of Information (website: <http://naih.hu/>; address: 1055 Budapest Falk Miksa utca 9-11. postal address: 1363 Budapest, Pf.: 9.; telefon: +36-1-391-1400, +36 (30) 683-5969, +36 (30) 5496838; fax: +36-1-391-1410; e- mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

### **8.10 Right to effective court remedy against the supervisory authority**

- (1) The data subject is entitled to effective court remedy against the supervisory authority's legally binding decision relevant to the data subject.
- (2) The data subject is entitled to effective court remedy in case the supervisory authority in charge does not deal with the complaint, or does not inform the data subject within three months about the developments or results of the procedure concerning the submitted complaint.
- (3) Proceedings against the supervisory authority shall be initiated at the court in the member state according to the registered seat of the supervisory authority.

### **8.11 Right to effective court remedy against Bátor Tábor or the data processor**

- (1) The data subject is entitled to effective court legal remedy without the infringement of the administrative or non-court legal remedies available, including the right to complaint at the supervisory authority, in case they have the opinion their rights according to the GDPR were infringed as their personal data were not managed in accordance with the GDPR.
- (2) Proceedings against Bátor Tábor or the data processor shall be initiated at the court of the member state according to the location of Bátor Tábor or the place of activity of the data processor. Such proceedings can also be started at a court in the member state according to the usual residence of the data subject. Such a lawsuit is under the competence of the General Court. The data subject can initiate the lawsuit at the General Court according to their domicile or habitual residence, as they wish. For information about the competent court (tribunal) and its contacts please visit the following website: [www.birosag.hu](http://www.birosag.hu).