

## DATA PROTECTION NOTICE

**Szövetség a Polgári Magyarországért Alapítvány** (hereinafter referred to in this notice as „**Controller**”) processes information regarded as „*personal data*” in line with Art. 4, point 1 of the General Data Protection of EU Nr. 2016/679 („**GDPR**”) of visitors of the Controller’s <https://europeuncensored.com> website („**Website**”) and users of its services provided through the Website in line with this data protection notice („**Notice**”).

In this Notice, you may find information on the **purpose, legal basis** of our processing and on the relevant **retention periods** and **recipients** of data transfers. We further inform you on your **data protection rights**, which you are entitled to exercise concerning our **data processing activities**.

Please, read our Notice thoroughly and in case of any questions or requests concerning the data processing of Controller, please contact us on the following contact information:

### **Szövetség a Polgári Magyarországért Alapítvány**

address: 1013 Budapest, Pauler utca 11.

e-mail address: [alapitvany@szpma.hu](mailto:alapitvany@szpma.hu)

website: [www.europeuncensored.com](http://www.europeuncensored.com)

data protection contact person: Ádám Kavecsánszki; for more information on contact data, please see above.

### **1. What do we do to protect your data?**

The Controller is committed to protecting your personal data and we will do our best to ensure that your personal data are processed in accordance with the law. The Controller follows the following principles in respect of its data processing activities:

- ✓ We only process personal data lawfully.
- ✓ We only process personal data for a specific purpose, economically and for a limited period of time.
- ✓ We protect your personal data.
- ✓ We help you enforce your data protection rights.

### **2. In which cases do we process your personal data?**

#### **2.1. Data processing of requests received by the Controller, enforcement of claims**

<b>For which purpose do we process your personal data?</b>	Answering requests received by the Controller (for example: inquiry concerning the Controller's services), as well as complaints, possible comments, fulfillment of the relevant legal obligations applicable to the Controller in case of consumer complaints, enforcement of the Controller's legal claims (claims management)..
<b>On what legal basis do we process your personal data?</b>	Data processing is necessary for the purposes of legitimate interest pursued by the Controller (Art. 6 (1) point f) of the GDPR).  The legitimate interest: handling the inquiries of interested parties and partners sent to the Controller, answering any questions, enforcing the Controller's possible claims, submitting legal claims, defending against the

	<p>claims of third parties.</p> <p>In case of consumer complaints: processing is necessary for compliance with a legal obligation to which the Controller is subject (Art. 6 (1) point c) of the GDPR) and in accordance with Art. 17/A of Act Nr. CLV of 1997 on Consumer Protection (“<b>Consumer Protection Act</b>”), in which cases the Controller processes personal data of data subjects concerning complaint management, responding consumer complaints, as well as protocols recorded on consumer complaints and copies of answers to such complaints.</p>
<b>Are you obliged to give your personal data?</b>	You are not obliged to submit a request or, if you qualify as a consumer, a consumer complaint, however, if you send a request to the Controller as well as a consumer complaint, the Controller will process your data in accordance with this Notice and for the period specified therein.
<b>What personal data do we process?</b>	<p>Personal data affected by the request and consumer complaint received by the Controller, contact data of data subjects and entities represented by them (name, address, e-mail address), content of claims (complaints), as well as requests lodged by the data subjects, recording actions taken on the request, in case of consumer complaints, protocols recorded on consumer complaints and copies of answers to such complaints based on Art. 17/A of Consumer Protection Act.</p> <p>We process your name and contact information (address, email address) in connection with a legal claim.</p>
<b>How long do we retain your personal data?</b>	Your data will be retained for <b>5 years</b> from the date of their being recorded (Art. 6:22 (1) of the Civil Code - unless otherwise specified in the Civil Code, claims will expire in 5 years). Protocols recorded on consumer complaints and copies of answers to such complaints are also recorded for <b>5 years</b> (Art. 17/A (7) of Consumer Protection Act).
<b>To whom do we transfer your personal data?</b>	We may transfer your personal data to our legal representative, the court of justice, or another authority (eg a notary) for the above purpose.

## **2.2. Data processing related to the facilitation of the exercise of data protection rights, measures taken following requests from data subjects, data breach management**

<b>For which purpose do we process your personal data?</b>	Handling of the requests of the data subjects received by the Controller, taking measures following them, facilitating the exercise of the data protection rights of the data subjects, data processing related to data breach management.
<b>On what legal basis do we process your personal data?</b>	<p>The processing is necessary for compliance with a legal obligation to which the Controller is subject (Art. 6 (1) point c) of the GDPR).</p> <p>The Controller is obliged to facilitate the exercise of the data protection (data subject) rights of the data subjects (Art. 12 (2) of the GDPR) and to investigate possible data breaches, notify the supervisory (data protection) authority and the data subject according to the seriousness of the data breach (GDPR Art. 33-34).</p>
<b>Are you obliged to give your personal data?</b>	In order to exercise your data protection rights, fulfill your related requests, and in the event of a data breach (eg a hacker attack), it may be necessary to process your personal data (especially your name and contact details

	provided to us). In this context, the Controller may request the provision of the above personal data for your identification and, in the case of requests sent electronically, if your identity needs to be verified, a photocopy of your identity card, passport or driving license (for example: e-mailing the PDF file of the photocopy). only for the purpose and for the duration of the verification of your identity and then the Controller immediately and irrevocably deletes any such photocopy received.
<b>What personal data do we process?</b>	The request to the Controller, your name and contact details (in particular: e-mail address).  In the case of requests sent by electronic means, if your identity is required, a photocopy of your identity card, passport or driving license, which will, however, be deleted immediately after viewing and will not be kept.
<b>How long do we retain your personal data?</b>	Your data will be stored for <b>5 years</b> from the date of recording (Section 6:22 (1) of the Civil Code - unless otherwise provided by the Civil Code, receivables will expire in 5 years). We do not store photocopies of your ID, passport or driver's license to identify you..
<b>To whom do we transfer your personal data?</b>	Your personal data may be transferred to that data protection authority in the event of any action by the competent data protection authority (especially in the event of a data breach, if the gravity and nature of this so require).

In addition to the above, the Controller will display advertisements on its [\[Facebook page availability\]](#) Facebook page (“**Facebook Page**”) in connection with which it processes the personal data of its Facebook page visitors. You can find more information about this in the Controller's cookie policy: [\[link of the cookie policy\]](#)

In connection with the above data processing of the Controller via Facebook, the Controller and Facebook Ireland Limited (4 Grand Canal Square, Dublin, Ireland) shall be considered as joint data controllers, so that the data subjects may exercise the data protection (data protection) ) rights set out in this Notice vis-à-vis either at the Controller or at Facebook Ireland Limited. In other cases, Facebook acts as an independent data controller and is independently responsible for the data processing it performs through Facebook. For more information, see Facebook's Privacy Policy (<https://en-en.facebook.com/privacy/explanation>) and Terms of Use (<https://en-en.facebook.com/legal/terms>).

### **3. What rights and remedies do you have concerning the Controller’s data processing activities?**

There will be no charge for responding to your privacy requests or for completing the request. When your request concerning the exercise of your data protection rights and remedies are manifestly unfounded or excessive (repeated) we may charge you an administrative fee to comply with the request, and – taking into account the administrative costs of providing the information or communication or taking the action requested – may refuse to act on the request.

The data protection rights and remedies of data subjects (including you if your personal data are processed by the Controller) are detailed in the relevant provisions of the GDPR (including in

particular GDPR 15, 16, 17, 18, 19, 21, 77, 78, 79, 80 and 82). The following is a summary of the most important provisions and, accordingly, the Controller provides information to those concerned about their data protection rights and remedies.

The Controller shall provide information on action taken on a request under Art. 15 to 22 of the GDPR to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the Controller does not take action on the request of the data subject, the Controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means (please, see above for more details).

The data protection rights and remedies of data subjects are detailed in the table below.

<p><b>Right of access</b></p>	<p>The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:</p> <ul style="list-style-type: none"> <li>a) the purpose of the processing;</li> <li>b) the categories of personal data concerned;</li> <li>c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries;</li> <li>d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;</li> <li>e) the existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;</li> <li>f) the right to lodge a complaint with a supervisory authority; and</li> <li>g) where the personal data are not collected from the data subject, any available information as to their source.</li> </ul> <p>Where personal data are transferred to a third country, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.</p> <p>The Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.</p>
<p><b>Right to rectification</b></p>	<p>You shall have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you and to have incomplete data completed, including by means of providing a supplementary statement.</p>

	Please note that reporting a change in your personal data helps the Controller to keep accurate information about you at all times.
<b>Right to restriction of processing</b>	<p>You may obtain of the Controller the restriction of processing of your personal data, if</p> <ul style="list-style-type: none"> <li>– the accuracy of the personal data is contested by you, for a period enabling the Controller to verify the accuracy of the personal data,</li> <li>– the processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead,</li> <li>– the Controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims,</li> <li>– you have objected to processing pending the verification whether the legitimate grounds of the Controller override those of yours.</li> </ul>
<b>Withdrawal of consent</b>	<p>If the legal basis for your data processing is your consent, you are entitled to withdraw your consent at any time. We highlight that you have the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>For the cases in which the Controller bases data processing on your consent, please see "<i>On what legal basis do we process your personal data</i>" section of this Notice.</p>
<b>Right to object</b>	<p>You may at any time object to the processing of your personal data if the processing is based on a legitimate interest of the Controller. For the cases in which the Controller bases data processing on its legitimate interest, please see "<i>On what legal basis do we process your personal data</i>" section of this Notice.</p> <p><b>The Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</b></p> <p><b>Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.</b></p>
<b>Right to erasure</b>	<p>You shall have the right to obtain from the Controller the erasure of personal data concerning you where one of the following grounds applies:</p> <ul style="list-style-type: none"> <li>– the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,</li> <li>– you withdraw your consent on which the processing is based, and where there is no other legal ground for the processing,</li> <li>– you object to the processing and there are no overriding legitimate grounds for the processing,</li> <li>– the personal data have been unlawfully processed,</li> <li>– the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject.</li> </ul>

<b>Complaint</b>	<p>You shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes GDPR. For the contact details of the competent supervisory (data protection) authorities in each EU Member State, see: <a href="https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm">https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm</a>. In Hungary, the competent supervisory authority is: the National Data Protection and Freedom of Information Authority (1125 Budapest, Szilágyi Erzsébet fasor 22 / C; postal address: 1530 Budapest, Pf.: 5; phone: + 36-1-391-1400; fax: +36 -1-391-1410; email: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>; website: <a href="https://naih.hu/">https://naih.hu/</a>; in Hungarian: “<i>Nemzeti Adatvédelmi és Információszabadság Hatóság</i>”). You further have the right to an effective judicial remedy to enforce your rights. Such proceedings may be brought before the courts of the Member State where you have your habitual residence. In Hungary, such litigation falls within the jurisdiction of the competent tribunal. You may also choose to bring the case before the competent tribunal of your domicile or place of residence. Information on the jurisdiction and contact details of the court (tribunal) can be found at <a href="http://www.birosag.hu">www.birosag.hu</a>.</p>
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