



PRIVACY NOTICE for university students

The Hungarian Dance Academy (hereinafter: MTE or Controller), as data controller, hereby informs its students and those in a preparatory legal relationship with MTE about the processing of their personal data. In respect to the processing of the personal data of dormitory admissions and residence, the data controller is Nádasi Ferenc High School of Hungarian Dance Academy (hereinafter: NFGK or Controller).

1. DATA AND CONTACT INFORMATION OF THE CONTROLLER

Data controller: **Hungarian Dance Academy**
(in Hungarian *Magyar Táncművészeti Egyetem*)
Seat: 1145 Budapest Columbus u. 87-89.
Postal address: 1592 Budapest Zugló 1., Pf. 472.
Email address: titkarsag@mte.eu

and in accordance with the present Privacy Notice

Data controller: **Nádasi Ferenc High School of Hungarian Dance Academy**
(in Hungarian *Magyar Táncművészeti Egyetem Nádasi Ferenc Gimnáziuma és Kollégiuma*)
Seat: HU-1145 Budapest Columbus u. 87-89.
Postal address: 1592 Budapest Zugló 1., Pf. 472.
Email address: gimnazium@mte.eu

Name and contact information of the data protection officer: Rendeki-Kovács Ügyvédi Iroda,
dpo@mte.eu.

The Controller complies with the applicable laws in the course of its processing activities, especially with the following:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: General Data Protection Regulation or GDPR);
- Act CXII of 2011 on the Right to Informational Self-determination and on the Freedom of Information (hereinafter: Info Act).

The Controller is committed to the protection of personal data, processes the personal data in a confidential manner, and implements appropriate security, technical and organisational measures to ensure the protection and security of the personal data.

The Controller reserves the right to amend the present Privacy Notice unilaterally at any time, the data subjects will be informed of any such amendment in due course.

2. CATEGORIES OF THE PERSONAL DATA PROCESSED, PURPOSE, LEGAL BASIS AND PERIOD OF THE DATA PROCESSING

I. Data processing in respect of prospective students	
Purpose of Data Processing	The legal organisation and management of the institutional admission procedure of higher education.
The Personal Data Processed	<p>Personal data contained in higher education admission documents, as well as other personal data provided during the higher education admission procedure, the processing of which is set out by Act CCIV of 2011 on National Higher Education (hereinafter: Nftv.), and Government Decree 423/2012 (XII. 29.) on Higher Education Admission Procedure.</p> <p>Based on the above, the processed personal data are the following:</p> <ul style="list-style-type: none"> - applicant's family and given name, gender, family and given name at birth, mother's family and given name at birth, place and time of birth, citizenship, home address, place of residence, contact number and address, in case of a non-Hungarian citizen: the legal residence address, the document allowing residence – according to separate law, for persons with the right of free movement and residence, a document certifying the right of residence - Hungarian licence, Hungarian licence of next-of-kin, and data of international insurance, - data of secondary education diploma, - data of secondary school, - data needed for the evaluation of application, - data of admission procedure, application identification number, - in the event of partially or fully funded government scholarship, the identification number of the declaration of preconditions to the course.
Legal Basis of the Processing	Compliance with the legal obligation to which the Controller is subject to (Article 6 (1) (c) of the GDPR) based on Annex 3 Chapter I/B. of Nftv. and the Student Requirements System of the Controller.
Persons Authorized to Access to the Personal Data	The data in the MTE and the Education Authority can be accessed by those responsible for the admission procedure for higher education.
Recipients of the Personal Data	Education Authority
Period of the Data Processing	<p>Those applicants' personal data processed in relation with the admission procedure who</p> <ul style="list-style-type: none"> - are not admitted to the university, - are admitted to the university but do not establish a legal relationship will be processed by the Controller until 31 December of the year

	<p>following the year of submission of the application form, after which the personal data will be erased.</p> <p>The Controller shall process the personal data of the applicants who are admitted to the university after the admission procedure for eighty years from the notification of the termination of the student's legal relationship in accordance with the provisions of Nftv.</p>
Possible Consequences of Failure to Provide the Personal Data	The provision of the above personal data is based on law, the data subject is not obliged to provide them. In the absence of the provision of personal data to be processed, MTE is not able to conduct the application procedure regarding the data subject.
II. Data processing in respect of students in higher education	
II./1.	Establishment and maintaining of student legal relationship
Purpose of Data Processing	<p>The MTE keeps and processes personal data essential to</p> <ul style="list-style-type: none"> - the intended operation of the institution, - exercising the rights and fulfilling the obligations of the applicants and students, - education, research organisation, - exercising employer's rights, as well as to exercise the rights and fulfil the obligations of lecturers, researchers and workers, - keep records required by law, - establish, assess and certify the entitlement to the benefits provided by the legislation and the organisational and operational rules of the higher education institution - the purpose of tracing the careers of the graduates. <p>MTE may only process personal and special categories of personal data in connection with legal relationship, the establishment and fulfilment of benefits and obligations, for reasons of national security, and managing the records specified by law, to the extent appropriate to the purpose.</p>
The Personal Data Processed	<p>The personal data stipulated by Nftv.:</p> <ul style="list-style-type: none"> - data related to the student legal relationship: <ul style="list-style-type: none"> • student's name, gender, birth name, mother's name, place and time of birth, citizenship, home address, place of residence, contact address and telephone number, email address, in case of non-Hungarian citizen: the name and number of document allowing residence – according to separate law, for persons with the right of free movement and residence, the name and number of document certifying the right of residence, • type of student (guest student) legal relationship as well as its date, of establishment and termination and method of same,



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	<p>name of the student's training, state support and work schedule, expected date of completion of the training, evaluation of the student's studies, examination data, semesters started, support period used, time of suspension of student status,</p> <ul style="list-style-type: none">• place and time of foreign part-time higher education,• credits obtained and recognised during the studies, credited studies admitted,• data on student benefits, data necessary for the assessment of entitlement to benefits (social status, data of parents, data on supports),• data on student employment,• data on student disciplinary and compensation matters,• data necessary for the assessment of special treatment for persons with disabilities,• data on accidents and personal injuries of the student,• student identification number, identification number of the student register file,• the student's education identification number, identification document number, photograph, and social security number,• data on any completion of internship, absolutorium, final exam (doctorate viva voce), language certificate, or certificates and any attachments to certificates,• data necessary for the completion for the rights and obligations emerging from student legal relationship; <p>- data for the purpose of tracing the careers of the graduates; - tax number of the student; - data to identify the documents certifying the data; - data of fees and charges paid by the student - instalment discount, deferral, exemption related to the obligation; - data in the case of provision of student or housing benefits, if the student is entitled to same due to receiving infant care fee, childcare allowance, child-raising allowance, regular child protection allowance, or in view of the student's disadvantaged circumstances, as well as the data of these fees and allowances; - data on the scholarship – established in accordance with the provisions of Section 85 (1) and (2) of the Nftv. by a Government Decree - granted for the support of the student's studies with regard to the student legal relationship; - data of competence measurements of the student and its outcome; - data on the existence and type of loan granted by the Student Loan Centre.</p>
Legal Basis of the Processing	Compliance with the legal obligation to which the Controller is subject to (Article 6 (1) (c) of the GDPR) based on Annex 3 Chapter I/B. of Nftv.
Persons	The authorized employees of the Controller to the extent that is



Authorized to Access to the Personal Data	essential for the performance of the position and the accomplishment of the managed task.
Recipients of the Personal Data	The processed personal data may be transferred, among others, to the below recipients: <ul style="list-style-type: none">- every data to the maintainer for the accomplishment of the controlling tasks;- data necessary to decide a specific case to courts, police, prosecutor's office, court enforcement officer, authorities;- every data necessary to the accomplishment of the tasks set out in Act CXXV of 1995 on national security services to the national security services;- every data to the institution responsible for the operation of the higher education information system;- data on the training and the student legal relationship to the institution responsible for the registration of the fulfilment of Hungarian state scholarships' conditions.
Period of the Data Processing	The personal data in this section shall be processed by the Controller for eighty years from the notification of the termination of the student's legal relationship in accordance with the provisions of Nftv.
Student Records	Student records are kept in the Electronic Education System (NEPTUN).
Possible Consequences of Failure to Provide the Personal Data	The provision of the above personal data is based on law, the data subject is not obliged to provide them. In the absence of the provision of the personal data to be processed, MTE may not be able to perform the task related to the purpose of the data processing.
II./2.	Scholarships, applications
Purpose of Data Processing	Establishment, evaluation and certification of eligibility for scholarships and applications.
The Personal Data Processed	The personal data stipulated in the relevant laws, especially in Annex 3 and 4 of Nftv., in Government Decree 87/2015. (IV. 9.) on the execution of certain provisions of the Act CCIV of 2011 on National Higher Education (hereinafter: NftvVhr.), and in Government Decree 51/2007. (III. 26.) on the allowances of higher education students and the fees to be paid by them. These personal data are of the scholarship paid in order to support the student's studies, taking into account the student's legal relationship, and the data related to the relevant application.
Legal Basis of the Processing	Compliance with the legal obligation to which the Controller is subject to (Article 6 (1) (c) of the GDPR).



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Persons Authorized to Access to the Personal Data	The authorized employees of the Controller as well as the management of the Students' Council to the extent that is essential for the performance of the position and the accomplishment of the managed task.
Recipients of the Personal Data	<p>The processed personal data may be transferred, among others, to the below recipients:</p> <ul style="list-style-type: none">- every data to the maintainer for the accomplishment of the controlling tasks;- data necessary to decide a specific case to courts, police, prosecutor's office, court enforcement officer, authorities;- every data necessary to the accomplishment of the tasks set out in Act CXXV of 1995 on national security services to the national security services;- every data to the institution responsible for the operation of the higher education information system;- data on the training and the student legal relationship to the institution responsible for the registration of the fulfilment of Hungarian state scholarships' conditions. <p>Personal data on the legal relationship and its status (active/passive) in regard with the BURSA scholarship to the body Human Resources Support Management (EMET).</p>
Period of the Data Processing	The personal data in this section shall be processed by the Controller for eighty years from the notification of the termination of the student's legal relationship in accordance with the provisions of Nftv.
Possible Consequences of Failure to Provide the Personal Data	The provision of the above personal data is based on legislation and with regard to social scholarship also on the Student Requirements System and the Student Remuneration and Allowance Policy, the data subject is not obliged to provide them. In the absence of the provision of the personal data to be processed, MTE may not be able to perform the task related to the purpose of the data processing, such as assessing the student's scholarship application.
II./3.	ERASMUS program
Purpose of Processing	Carrying out tasks related to the announcement and awarding of Erasmus applications, the fulfilment of study and other contracts concluded in connection with successful applications. The program is launched by the European Union and is managed by the European Commission, the Education, Audio-visual and Culture Executive Agency (EACEA), the National Agencies in the Program Countries and the National Centres in each partner country.
The Personal Data Processed	Personal data contained in the application form and / or in the study, grant or other contract or in the relevant decision (applicant's surname and forename, gender, surname and forename of birth, mother's



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	surname and forename, place and date of birth, nationality, home address, place of residence, contact address and telephone number, in the case of a non-Hungarian citizen: the title of residing in the territory of Hungary and the document authorizing the residence, bank account number).
Legal Basis of the Processing	Performance of a contract concluded or to be concluded with the Controller (Article 6 (1) (b) of the GDPR).
Persons Authorized to Access to the Personal Data	Members of the Erasmus Committee, members of the Students' Council, Erasmus Coordinator, members of the Credit Transfer Committee.
Recipients of the Personal Data	The personal data processed will be transferred to the following recipients: host higher education institution, Tempus Public Foundation, European Commission
Period of the Data Processing	The personal data in this section - primarily contained in the documents supporting the settlement of accounts - will be processed by the Controller for 10 years from the closing of the program.
Possible Consequences of Failure to Provide the Personal Data	In the absence of the provision of the personal data to be processed, MTE may not be able to perform the task related to the purpose of the data processing, such as assessing the student's application for participation in the Erasmus program.
II./4.	Data processing relating to payment and enforcement of fees
Purpose of Processing	The management of claims against the student.
The Personal Data Processed	Personal data set out in Nftv., NftVhr. and Government Decree 51/2007. (III. 26.) on the allowances of higher education students and the fees to be paid by them. For example the amount of the student's debt (e.g. library fee, compensation, exam fee, tuition fee, canteen fee, dormitory fee) and its due date etc.
Legal Basis of the Processing	Compliance with the legal obligation to which the Controller is subject to (Article 6 (1) (c) of the GDPR).
Persons Authorized to Access to the Personal Data	The authorized employees of the Controller to the extent that is essential for the performance of the position and the accomplishment of the managed task.
Recipients of the Personal Data	The Controller occasionally uses the assistance of lawyers in order to enforce its legitimate claims.
Period of the	The personal data in this section shall be processed by the Controller

Data Processing	for five years from the notification of the termination of the student's legal relationship in accordance with the provisions of Nftv.
II./5.	Data processing of Vályi Rózsi Library, Archives and Dance-science Research Centre
Purpose of Processing	Performance of the public service tasks laid down in Nftv. and Act CXL of 1997 on Museum Institutions, Public Library Services and Public Education (hereinafter: Library Act), in the course of same identifying the data subject in order to provide library services and establish library membership, furthermore the processing of data necessary for contact and, where appropriate, data relating to the enforcement of claims.
The Personal Data Processed	Identification data indicated on the Registration Form and the Enrolment Declaration, i.e.: name; birth name; place and date of birth; mother's birth name; address (permanent address, place of residence, or postal address); telephone number; email address; employment, public service, higher education student, student or other relationship with MTE, NFGK or other educational institution; course; furthermore in case of persons under 18: name and contact details of the legal guardian (parent, guardian). Personal data generated, recorded or otherwise processed in connection with the use of library services.
Legal Basis of the Processing	With regard to natural personal identification data and address data indicated on the Library Registration Form and Enrolment Declaration, the legal basis is the compliance with the legal obligation to which the Controller is subject to (Article 6 (1) (c) of the GDPR) based on Section 56 (3) and Section 57 (1) of the Library Act. With regard to the further personal data the legal basis of the data processing is: <ul style="list-style-type: none"> a) for the purpose of contact and enforcement of legitimate claims, the legitimate interest of the Controller for contacting and enforcing legitimate claims in connection with the provision of library services (Article 6 (1) (f) of the GDPR), b) for the purpose of providing benefits - depending on the beneficiary - either the compliance with the legal obligation to which the Controller is subject to (Article 6 (1) (c) of the GDPR) based on Section 56 (6) of the Library Act, or the legitimate interest of the Controller in providing benefits (Article 6 (1) (f) GDPR).
Persons Authorized to Access to the	The authorized employees of the Controller to the extent that is essential for the performance of the position and the accomplishment of the managed task.

Personal Data	
Recipients of the Personal Data	The Controller occasionally uses the assistance of lawyers in order to enforce its legitimate claims.
Period of the Data Processing	The period of the data processing is 1 year after the termination of the library membership. If the student has debt to the library at the time of the termination of the library membership, the period of the data processing is 5 years after the termination of the library membership. Invoices issued for library fees - and the personal data included therein - will be retained for a duration of 8 years in accordance with Act C of 2000 on Accounting.
Possible Consequences of Failure to Provide the Personal Data	The provision of the personal data to be processed due to the Library Act is based on legislation, the data subject is not obliged to provide them. In the absence of the provision of the personal data to be processed, MTE may not be able to perform the task related to the purpose of the data processing, such as providing library services.
II./6.	Images and videos taken of students in the context of art education activities
Purpose of Processing	It derives from the essential nature of arts education activities carried out by the Controller - the training of performers - that image and video recordings are made with the participation of students during the trainings, examinations and performances. These recordings are also be used for educational (e.g. photographic exam sheets to support the work of the examination committee), documentation (e.g. yearbook), promotional (e.g. publications promoting the Controllers' training programs) and artistic (e.g. posters of performances) purposes. The posters of the performances also show the names of the students participating in the performance. The taking and use of images and videos as well as indicating the names on the posters of the performances are done solely for the purpose of educating and examining students, and for the purpose closely related to the implementation of performing artist training due to the nature of MTE's educational activities.
The Personal Data Processed	The image and name of the data subject.
Legal Basis of the Processing	Legitimate interest of the Controller in achieving the purpose of the education (Article 6 (1) (f) of the GDPR), since this data processing is an essential part of the implementation of the performing artist training, the education cannot be implemented in any other way.



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Persons Authorized to Access to the Personal Data	The authorized employees of the Controller to the extent that is essential for the performance of the position and the accomplishment of the managed task.
Recipients of the Personal Data	Persons to whom the image and video recordings and the names of the data subjects are disclosed (e.g. cooperating theatre, artistic company).
Period of the Data Processing	Unless otherwise provided by law, data processing takes place during the existence of the student legal relationship.
II./7.	Data processing of the dormitory
Data Controller	Nádasi Ferenc High School of Hungarian Dance Academy
Purpose of Processing	<p>Dormitory care for university students in a student legal relationship with the Controller, including the assessment of students' admission applications, the registration and identification of admitted students, and contact with students.</p> <p>The name and telephone number of the parents (guardians) / legal representative are recorded by the Controller for the purposes of notifying the parent (guardian) / legal representative of an event related to the student and affecting them.</p>
The Personal Data Processed	<p>In the course of the college application procedure:</p> <ul style="list-style-type: none">- student's surname and forename, gender, birth surname and forename, mother's and father's surname and forename, place and time of birth, citizenship, home address, place of residence, contact address and telephone number, email address, in case of non-Hungarian citizen: the title of residing in the territory of Hungary and the document authorizing the residence – according to separate law, for persons with the right of free movement and residence, a document certifying the right of residence - Hungarian licence, Hungarian licence of next-of-kin, and data of international insurance,- social security number,- data on family, social and health background (number of siblings, data on any disadvantage: publicly employed parent, unemployed parent, disabled parent/sibling, household parent, parent receiving GYES / GYED / GYÁS benefits, disabled pensioner parent/sibling, family member undergoing regular medical treatment, parent receiving regular childcare allowance, single parent, student with special needs (SNI), half orphan). <p>In the case of students admitted to the dormitory, the student's surname and forename, place and date of birth, mother's name and</p>



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	<p>home address are processed in the residential contract concluded with the student.</p> <p>Any additional personal data may need to be processed in connection with the dormitory's accommodation and way of life, as well as in the event of authority action, elemental disaster, vandalism, accident, or disciplinary proceeding.</p>
Legal Basis of the Processing	<p>The legal basis for the data processing in regard with carrying out the dormitory admission procedure is the Controller's legitimate interest in determining the order of admission (Article 6 (1) (f) of the GDPR).</p> <p>For students admitted to the dormitory, the legal basis for the data processing is the compliance with the residential contract concluded with the student (Article 6 (1) (c) of the GDPR).</p> <p>The legal basis for the processing of the above personal data of the parents (guardians) / legal representative is the Controller's legitimate interest in keeping contact in connection with the dormitory care of students (Article 6 (1) (f) of the GDPR).</p>
Persons Authorized to Access to the Personal Data	<p>The authorized employees of the Controller to the extent that is essential for the performance of the position and the accomplishment of the managed task.</p>
Recipients of the Personal Data	<p>Education Authority for certain personal data</p>
Period of the Data Processing	<p>The period of the data processing is 1 year after the termination of the student's membership in the dormitory. If the student has debt to the Controller at the time of the termination of the student's membership in the dormitory, the period of the data processing is 5 years after the termination of the membership.</p>
Possible Consequences of Failure to Provide the Personal Data	<p>The provision of personal data processed in a residential contract is a precondition for concluding the contract, the data subject is obliged to provide them. In the absence of the provision of the personal data to be processed, MTE may not be able to perform the task related to the purpose of the data processing, such as providing dormitory accommodation for the student.</p>
III. Data processing in connection with preparatory legal relationships	
Purpose of Processing	<p>To prepare students in preparatory legal relationships for admission to MTE.</p>
The Personal Data Processed	<p>Personal data processed in respect of students in preparatory legal relationship are as follows:</p> <ul style="list-style-type: none">- In connection with the application for admission: personal data (name, birth data, address, caregiver, contact details of the

	<p>caregiver) and the result of the medical aptitude test;</p> <ul style="list-style-type: none"> - In the course of the preparatory relationship: study results by subject and professional warnings. <p>In other respects, Section II/5-6. of this Privacy Notice shall apply <i>mutatis mutandis</i> to the preparatory legal relationship.</p>
Legal Basis of the Processing	In the case of those in a preparatory legal relationship, the legal basis for data processing is the Controller's legitimate interest in preparing the students concerned for admission to MTE (Article 6 (1) (f) of the GDPR).
Persons Authorized to Access to the Personal Data	The authorized employees of the Controller to the extent that is essential for the performance of the position and the accomplishment of the managed task.
Recipients of the Personal Data	The personal data will not be transferred to any third parties.
Period of the Data Processing	The Controller shall process the personal data in this section for eighty years from the notification of the termination of the preparatory legal relationship in accordance with the provisions of Nftv.

3. DATA SECURITY MEASURES

The Controller stores the personal data at its seat on a paper-based way and on the servers thereat. The Controller does not use services of third parties to the storage of the personal data, and not assign data processors. The Controller implements appropriate IT, technical and personnel-related measures to ensure the protection of the processed personal data against, among others, unauthorised access or unlawful alteration. The IT Policy of the Controller regulates the protection of electronically stored data.

4. RIGHTS OF THE DATA SUBJECTS

4.1. **Brief summary of your rights (the detailed description of the rights is set forth in the next point):**

1. right to transparent information – **you may require information about the processing of your personal data at any time;**
2. right of access to your personal data – **you may have access to your personal data processed by us and to the details of the processing at any time;**
3. right to rectification of your personal data – **if we process your personal data inaccurately, please, let us know and we will rectify them;**
4. right to erasure ('right to be forgotten') and right to restriction of the data processing – **in certain cases, you are entitled to require us to erase your personal data processed, or to store them only without any other processing activity;**



5. right to data portability (only in regard with data processed based on consent or contract, if the processing is carried out by automated means) – **if you need them we provide you, in electronic format, with your personal data which you have provided to us;**
6. right to object – **you may object to the processing of your personal data which is based on legitimate interest at any time;**
7. right to remedy – **in case your rights are infringed you may turn to the data protection officer or seek remedy at the Hungarian National Authority for Data Protection and Freedom of Information or the courts.**

Who can you turn to if you would apply for remedy or if you have questions regarding the data processing?

With questions, requests: to the data protection officer of the Controller

The data protection officer is:

Rendeki-Kovács Law Firm (Rendeki-Kovács Ügyvédi Iroda)

email address: dpo@mte.eu

With filing a complaint: to the Hungarian National Authority for Data Protection and Freedom of Information

Contact information of the Authority (in Hungarian *Nemzeti Adatvédelmi és Információszabadság Hatóság*):

Registered office: HU-1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Website: www.naih.hu

Telephone number: +36-1-391-1400

You may launch a lawsuit for the protection of your personal data

against the Controller as respondent at the regional courts competent, at your discretion, based on the seat of the Controller or your residence, which proceeds with priority in the case. The Budapest-Capital Regional Court (in Hungarian *Fővárosi Törvényszék*) has competence for the lawsuit based on the seat of the Controller.

4.2. Detailed description of the rights and remedial opportunities of the data subjects concerning the data processing

Being aware of the rights and remedial opportunities of the person affected by the data processing (hereinafter: data subject) is important since the Controller processes personal data.

Any information shall be qualified as **personal data** based on which the data subject can be identified. Accordingly, not only the name or the ID number of the data subject is personal data but any information relating to him/her.¹

¹ 'personal data' (Article 4 (1) of the GDPR) 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;



According to the provisions of Chapter III ('Rights of the data subject') of the GDPR **the data subjects shall have the following rights:**

1. Right to information (Articles 12-14 of the GDPR)

The controller shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The Controller fulfils its obligation on providing information in regard with the data processing set out here through the present document.

Right to withdraw the consent: if the data processing is based on the consent of the data subject (i.e. on Article 6 (1)(a) or Article 9 (2)(a) of the GDPR), the data subject shall have the right to withdraw his/her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal

2. Right of access by the data subject (Article 15 of the GDPR)

The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the data processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- the envisaged period for which the personal data will be stored;
- the existence of the right to request from the Controller rectification or erasure of personal data, restriction of data processing, or to object to the data processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

If the personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

The Controller shall provide a copy of the personal data undergoing the data processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. The Controller provides the information in electronic form if the data subject requires so.

The right to information may be exercised in writing (including the electronic format) through the above contact details of the Controller, and it may be fulfilled after the identity of the data subject is verified in an authentic way.



3. Right to rectification of the data subject's data (Article 16 of the GDPR)

The data subject shall have the right to obtain from the Controller the rectification of inaccurate

personal data concerning him/her as well as to have incomplete personal data completed, which the Controller has to perform without undue delay.

4. Right to erasure - 'right to be forgotten' (Article 17 of the GDPR)

The data subject shall have the right, should any of the following grounds exist, to obtain from the Controller the erasure of personal data concerning him/her without undue delay:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing (if applicable);
- the personal data have been unlawfully processed;
- 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;
- the personal data have been collected in relation to the offer of information society services.

The above rule on the erasure of the data shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- for reasons of public interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
- for the establishment, exercise or defence of legal claims.

5. Right to restriction of processing (Article 18 of the GDPR)

The data subject shall have the right to obtain from the Controller restriction of the data processing if one of the following conditions applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the data processing, in which case the restriction is applicable for the period until it is verified whether the legitimate grounds of the Controller override those of the data subject.



If the data processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of the data processing shall be informed by the Controller before the restriction of processing is lifted.

6. Notification obligation regarding rectification or erasure of the personal data or restriction of the data processing (Article 19 of the GDPR)

The Controller shall communicate any rectification or erasure of the personal data or restriction of the data processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.

7. Right to data portability (Article 20 of the GDPR)

The data subject shall have the right to receive the personal data concerning him/her, which he/she has provided to a Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, if

- the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and
- the processing is carried out by automated means.

In exercising his/her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

The exercise of this right shall be without prejudice to the right to be forgotten. This right shall not adversely affect the rights and freedoms of others.

8. Right to object (Article 21 of the GDPR)

The data subject shall have the right to object, on grounds relating to his/her particular situation, at any time to the processing of personal data concerning him/her which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, or which is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, including profiling based on those provisions. 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.

If the personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of the personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.



9. Right of the data subject in case of automated individual decision-making (Article 22 of the GDPR)

The data subject shall have the right not to be subject to a decision based solely on automated data processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

The above right shall not apply if the decision:

- is necessary for entering into, or performance of, a contract between the data subject and the Controller;
- is authorised by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

Proceeding of the Controller in case of the data subject exercises his/her rights:

The Controller shall provide information to the data subject on the action taken on a request under Articles 15 to 22 without undue delay and in any event within one month as of receipt of the request. That period may be extended by two further months if 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 as of receipt of the request, together with the reasons for the delay. If the data subject makes the request by electronic 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 as 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.

Information provided and any communication and any actions taken shall be provided free of charge. If the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

The Controller shall communicate any rectification or erasure of the personal data or restriction of the data processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.

The Controller shall provide a copy of the personal data undergoing the data processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. If 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.

Possibility of remedy regarding the data processing:

With questions and requests, you may turn to the data protection officer of the Controller, i.e. to:

Rendeki-Kovács Law Firm (Rendeki-Kovács Ügyvédi Iroda)

email address: dpo@mte.eu.



If you believe that the Controller has infringed the applicable data protection laws in the course of the processing of your personal data,

- you may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (in Hungarian *Nemzeti Adatvédelmi és Információszabadság Hatóság*):

Registered office: HU-1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Mailing address: 1530 Budapest, Pf.: 5.

Email address: ugyfelszolgalat@naih.hu

Website: www.naih.hu

Telephone number: +36-1-391-1400

or

- you may launch a lawsuit for the protection of your personal data against the Controller as respondent at the regional courts competent, at your discretion, based on the seat of the Controller or your residence, which proceeds with priority in the case. The Budapest-Capital Regional Court (in Hungarian *Fővárosi Törvényszék*) has competence for the lawsuit based on the seat of the Controller.