

**Data Processing Regulation of the year 2019 15th  
European Maccabi Games**

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### **PREAMBLE**

The year 2019 15th European Maccabi Games (hereinafter: EMG 2019) shall be organized in Budapest between 29 July 2019 and 07 August 2019; the organizers of the event are the following: Magyar Testgyakorlók Köre Budapest (hereinafter: MTK) and EMG 2019 Sport Szervező Korlátolt Felelősségű Társaság (hereinafter: EMG 2019 SPORT Kft.) (hereinafter together as: Organizers or Data Controllers).

During the performance of the tasks concerning the organization and conducting of the event the Organizers intend to ensure that the data protection legal regulations and other provisions concerning the participants, sports and other professionals, and persons performing tasks in the course of conducting the EMG 2019 are complied with and enforced.

For the above purpose the Organizers, based on Regulation (EU) 2016/679 of the European Parliament and of the Council 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: GDPR) – applicable from 25 May 2018 – and, in matters not provided for in the GDPR, on Act 112/2011 on the right to information self-determination and the freedom of information (hereinafter: the Information Act), establish the following regulation:

## **I. Details of the data controllers**

With regards to data processing in connection with the EMG 2019 the Organizers, that is, MTK and EMG 2019 SPORT Kft. are joint data controllers based on a contract established between them.

### **1. Details of the data controllers:**

- a) **Magyar Testgyakorló Köre Budapest** (abbreviated name: MTK, registered office: 1087 Budapest, Salgótarjáni út 12-14., registration number: 01-02-0001500, registration authority: Budapest-Capital Regional Court, tax number: 19804651-2-42, community tax number: HU19804651, represented by: Péter Deutsch acting chairman)
- b) **EMG 2019 SPORT Szervező Korlátolt Felelősségű Társaság** (abbreviated name: EMG 2019 SPORT Kft., registered office: 1087 Budapest, Salgótarjáni út 038821/4., company registry number: 01-09-273174, registration authority: Registry Court of the Budapest-Capital Regional Court, tax number: 25403589-2-42, community tax number: HU25403589, represented by: Péter Deutsch managing director)

### **2. Contact details of the data controllers:**

Mail address: 1440 Budapest, Pf. 93.; 1440 Budapest Pf. 93/5.

Telephone: +36-1-487-2500

E-mail: [adatvedelem@mtk1888.hu](mailto:adatvedelem@mtk1888.hu), [adatvedelem@emg2019.hu](mailto:adatvedelem@emg2019.hu)

### **3. Essential content of the joint data controlling agreement:**

The Data Controllers specified the distribution of their respective responsibilities under the GDPR in the agreement they established about joint data controlling.

Essential content of the agreement:

- a) Ensuring rights of the data subjects:  
The data controllers jointly prepared their data processing information according to Articles 13 and 14 of the GDPR to inform data subjects. In this information the names and contact details of the Data Controllers are also included.  
The Data Controllers jointly ensure exercising the rights of the data subjects as specified in Articles 12 to 22 of the GDPR.  
The data subject can turn to any one of the Data Controllers with their inquiries concerning any of the Data Controllers and can exercise their rights under GDPR against any of them. In this regard the Data Controllers shall cooperate with each other according to the provisions of the GDPR.
- b) Storage of personal data, data security measures  
Personal data shall be protected by the Data Controllers against alteration, loss, erasure or access by unauthorized persons with the appropriate technical and organizational security measures. The data of the data subjects are stored at the registered office of the MTK, in the case of both physical and electronic copies; the data carriers are placed in a closed location, only accessible by persons with competence according to their respective jobs and tasks.
- c) Responsibility of data controllers  
The data controllers are responsible for damages caused by violating the provisions specified in the GDPR. The data controllers are released from their responsibility if they can prove that they are in no way responsible for the event causing the damage. The responsibility of the Data Controllers towards the data subject is joint and several, that is, the data subject can enforce their claims against any one of them and any performance by a Data Controller also decreases the liability of the other obliged party towards the data subject as well, to the extent of the performed part. In their relationships between each other the Data Controllers are responsible proportionate to the extent of their respective responsibility; if this cannot be determined then in equal proportion.

## **II. Definition of terms**

Within the meaning of the present Regulation:

1. **data processor:** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
2. **processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
3. **Data controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**The legal entities specified in Section I.1. are joint Data Controllers concerning the EMG 2019.**

4. **data breach:** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
5. **EMG 2019:** the Jewish sports, religious and cultural event named Year 2019 15<sup>th</sup> European Maccabi Games to be organized in Budapest between 29 July 2019 and 07 August 2019.
6. **Data subject or person entitled to the personal data:** any specific natural person who is identified or – directly or indirectly- could be identified based on the Personal Data.

**This Data Processing Regulation differentiates between the following categories of data subjects:**

1. **Participants:** Athletes, Sports Professionals, Relatives, that is, every member of the delegation together according to the specifications of the General Rules & Regulations concerning EMG 2019, who are entitled to participate in the EMG 2019.
2. **Volunteers:** natural persons contributing as volunteers during the EMG 2019 and with whom Magyar Testgyakorlók Köre Budapest concluded a volunteer contract.
3. **Madriches:** natural persons performing tasks during the EMG 2019 as madriches and with whom the EMG 2019 SPORT Kft. concluded contracts about performing madrich activities.
4. **Press employees:** natural persons registering for the EMG 2019 as press employees on the EMG 2019 online accreditation interface provide by the Organizers for the media.
5. **Other accredited persons:** natural persons who:
  - a) are performing tasks and contribute to such tasks for the contractual performance of tasks, obligations accepted in works, agency, lease or other contracts on providing services, concluded directly or indirectly (under a contract concluded with the contractual partner of the Organizers) by and between the Data Controllers as Organizers and third parties (lessors, contractors, manufacturers, etc.), including in particular the following:
    - employees, agents, workers of the third party (lessor, contractor, manufacturer, etc.),
    - employees, agents, workers of the subcontractors of the third party (lessor, contractor, manufacturer, etc.) involved in the performance of tasks.
  - b) employees, officials, agents, workers of organizations belonging to categories subject to accreditation based on the decision of the Data Controllers or their agreement with the Data Controllers.
7. **Authority:** the Hungarian National Authority for Data Protection and Freedom of Information.
8. **Contribution:** voluntary, actual and clear expression of the will of the data subject based on appropriate information by which the data subject signs their consent to the processing of personal data concerning them through the statement in question or an act clearly expressing confirmation.
9. **Regulation:** this regulation, which is the data processing regulation concerning the EMG 2019 and issued by the Data Controllers.

10. **personal data:** any information related to identified or identifiable natural persons; identifiable is the natural person who is directly or indirectly identifiable based on one or more factors, especially any identifier, like name, data of personal identification documents, location data.

### **III. Scope of the regulation**

1. The scope of this Regulation extends to every executive, employee, agent of the Data Controllers and to other persons in a legal relationship with the Data Controllers aimed at employment who shall comply with the provisions of the established legal regulations, the GDPR, the Information Act and this Regulation concerning data protection in the course of performing activities related to the EMG 2019.
2. Additionally, the scope of the Regulation extends to athletes participating in the EMG 2019, sports professionals, the Relatives of the same, the volunteers, madriches, press employees, natural persons performing tasks in the course of the EMG 2019 and other accredited persons whose personal data shall be processed by the Data Controllers in compliance with the provisions specified in this Regulation.

### **IV. Data processing concerning the EMG 2019**

Categories of data processing concerning personal data and performed by the Data Controllers:

- A) Data processing performed in connection with the personal data of participants
- B) Data processing performed in connection with the personal data of volunteers
- C) Data processing performed in connection with the personal data of madriches
- D) Data processing performed in connection with the personal data of press employees
- E) Data processing performed in connection with the personal data of other accredited persons

#### **IV/A. Data processing performed in connection with the personal data of participants**

Data processing discussed in this section concerns the Participants, that is, those natural persons who – according to the specifications of the General Rules & Regulation concerning the EMG 2019 - qualify as Athletes, sports professionals, or Relatives, that is, delegation members, and who are entitled to participate in the EMG 2019.

##### **1. Purpose of the data processing:**

The purpose of the data processing performed by the Data Controllers in connection with the Participants is that the Organizers can provide and grant all those services for the Participants that are necessary for participation in a sports event, including in particular the following:

- booking accommodation,
- providing transportation,
- accreditation for the EMG 2019, safe check-in to the locations of the EMG 2019 and the preparation of the accreditation card required for the check-in,
- facilitating, ensuring the visit to Hungary (primarily for citizens of non-EU countries),
- organizing, conducting the competition,
- granting special requests concerning catering,
- providing healthcare services.

Additional purpose of processing personal data of the Participants:

- informing the public about the EMG 2019, providing news,
- compliance with the legal obligations concerning the Data Controllers,
- enforcing the rightful interests of the Data Controllers and the Participants.

##### **2. Personal data categories concerned, scope of processed data**

The Data Controllers are entitled to become aware of and process the following personal data of the Participants for the purposes specified in Section IV/A.1:

- a) full name (first name and last name)
- b) full birth name
- c) birthplace (country, municipality), date
- d) address (country, ZIP code, city, street, number), place of residence
- e) mother's name
- f) citizenship
- g) ID card number or passport number
- h) telephone number
- i) e-mail address
- j) Hungarian social security identification number (TAJ number), if applicable
- k) health, sports, accident and passenger insurance number, if applicable
- l) in case of data subjects under the age of 16, the full name of the legal representative
- m) photograph
- n) gender
- o) Photograph and video footage about the participant
- p) special data:
  - healthcare data: allergies, regularly taken medicines, Therapeutic Use Exemption (TUE), surgery history, concussion history, vaccines, other illnesses (asthma, stroke, eating disorders, EKG irregularities)
  - concerning athletes: data concerning Jewish origins.

### **3. Legal basis for data processing:**

Based on Article 6, Section (1), point f) of the GDPR the legal basis for the data processing concerning the Participants is the rightful interest of the Data Controllers as Organizers to:

- comply with the requirements, provisions required by the European Maccabi Confederation concerning the EMG 2019,
- organize, conduct the EMG 2019 according to the rules, customs concerning the Maccabi Games,
- implement the security and other provisions concerning the check-in procedure to the EMG 2019 and the locations of the EMG 2019 by the Data Controllers as Organizers,
- the organization of the EMG 2019 according to the general sports professional provisions, rules,
- exercise the broadcast rights of the Data Controllers concerning the EMG 2019, by which they can broadcast the EMG 2019 to the public, providing news about it, preparing reports, document it with photographs and video footage, thereby promoting the EMG 2019 and the Maccabi events.

Concerning the enforcement of the rightful interest of the Organizers the rights and liberties of the data subjects which make the protection of personal data necessary were considered. In this regard the Data Controllers considered that the scope of the processed personal data was determined in part based on an official request, and in part according to the process of accreditation and organizing the EMG 2019. All personal data named in Section 2 will only be used by the Organizers in connection with the participation of the data subject in the EMG 2019 to the extent and for the period necessary for the purpose of the data processing.

Considering that the processing of personal data is essential concerning the participation of the data subjects in the EMG 2019 and that the personal data will be processed expressly and exclusively with regards to the participation of the data subjects in the EMG 2019, the Organizers came to the conclusion that there are no circumstances concerning the use of the legal basis for data processing according to Article 6, Section (1), point f) of the GDPR concerning which the rights and liberties of the data subjects would enjoy preference over the exercise of the rightful interests of the Organizers as data controllers in a manner excluding data processing.

A further legal basis for data processing is compliance with the legal obligation concerning Data Controllers pursuant to Article 6, Section (1), Sub-Section c) of the GDPR arising in connection with guaranteeing the adequate level of security for the EMG 2019.

In the case of special data the legal basis for data processing are Sub-Sections d) and h) of Article 9, Section (2) of the GDPR, considering that:

- only athletes of Jewish origin can participate in the Maccabi Games, therefore in the EMG 2019 too, so in the case of athletes it is necessary to obtain and process this data;
- to grant special requests concerning catering it is necessary to know the relevant healthcare data;
- due to the EMG 2019 being a sports event, in order to appropriately treat possible injuries it is necessary to know the relevant healthcare data.

Additionally, the legal basis for data processing is the consent of the Participant (GDPR, Article 6, Section (1), Subsection a), Article 9, Section (2), Subsection a)). Obtaining the consent of the Participant is the task and obligation of the Territorial Organization (TO); the TO shall upload the statement to the online accreditation system of the EMG 2019 when registering, nominating the Participant for the EMG 2019. By signing the statement of consent – which, at the discretion of the TO, can be a statement provided by the Data Controllers or the statement applied by the TO itself - the consent of the Participant to the data processing need to be considered given.

<b>Legal basis for the data processing performed by the Data Controllers – summary table</b>			
<b>Personal data</b>	<b>Legal basis – per data processing goal</b>		
	<b>Rightful interest</b>	<b>Legal obligation</b>	<b>Consent</b>
full name (first name and last name)	x	x	
full birth name		x	
place (country, municipality), date of birth	x	x	
address (country, ZIP code, town, street, number), place of residence		x	
mother's name		x	
citizenship	x	x	
number of ID card / passport	x	x	
telephone number		x	
email address		x	x
Hungarian social security identification number (TAJ number), if applicable	x		x
number of health, sports, accident and passenger insurance, if applicable	x		x
in case of data subjects under the age of 16, the full name of the legal representative		x	
photograph	x		
gender	x		
Photograph and video footage about the participant	x		x
	<b>Legal basis</b>		

Special personal data	GDPR Article 9, Section (2), Sub-section h)	GDPR Article 9, Section (2), point d)	Consent
healthcare data	x		x
athletes data concerning Jewish origins		x	x

#### 4. Period of data processing:

The Data Controllers are processing the personal data of the Participants from the uploading of such data to the online accreditation system of the EMG 2019 until the end of a period of 3 business days following the EMG 2019, provided that the authority authorized to do so does not request the Data Controllers to keep the personal data for a specific additional time.

#### 5. Data transferring

The Data Controllers only transfer the data of the Participants to third parties in the following cases:

- if the data transfer is required by legal regulations (in particular if the court, authority or other organ as the recipient of the data transfer delivers an official inquiry to the Data Controllers);
- Based on the Hungarian legal regulations (Act 125/1995 on the national security services and Act 34/1994 on the police force) the Data Controllers are obliged to hand over, transfer specific personal data of the data subjects to the Hungarian counter-terrorism organization (Counter Terrorism Centre) in order to guarantee the appropriate level of security for the EMG 2019;
- the name, portrait of the data subject and the data assigned to their accreditation clearance level are forwarded to the company manufacturing the accreditation cards (GT Bt., and Informsped Kft.) in order to issue the accreditation card;
- the data necessary for providing the service in question will be transferred to the partner of the Data Controllers providing accommodation, transportation, services in order to provide accommodation, transportation and other services;
- If it becomes necessary, the Data Controllers may transfer the data to the organizing authority performing the check-in.

#### 6. Rights of the Participants

If the Participant intends to exercise their rights under the GDPR concerning the data processing performed by the Data Controllers, they can do so in writing, in English or Hungarian language. If the Participant is under the age of 16, their rights can be exercised by their legal representative.

The Participants are entitled to the following rights from the rights of the data subjects specified in Section V of the Regulation, considering the legal basis for the data processing:

Right	Performance of the legal obligation	Rightful interest	Consent
access to personal data and information concerning data processing	x	x	x
right to portability concerning the provided data			x
right to erasure		x	x
right to restriction	x	x	x
right to rectification	x	x	x
right to objection		x	x
revocation of consent			x
Right to turn to the authorities or the court	x	x	x



## **IV/B. Data processing performed in connection with the personal data of volunteers**

Data processing discussed in this section concerns the Volunteers, that is, natural persons contributing as volunteers in the course of the EMG 2019 and with whom Magyar Testgyakorlók Köre Budapest concluded a volunteer contract.

### **1. Purpose of the data processing:**

The purpose of the data processing performed by the Data Controllers in connection with the Volunteers is the following in particular:

- conclusion and maintenance of the volunteer contract, exercising rights and performing obligations (especially the obligations under Act 88/2005 on volunteer activity of public interest) under this legal relationship, termination of the legal relationship;
- facilitating, ensuring the visit to Hungary (primarily for citizens of non-EU countries),
- granting special requests concerning catering,
- providing uniform for the Volunteers.

Additional purpose of processing personal data of the Volunteers:

- informing the public about the EMG 2019, providing news;
- accreditation for the EMG 2019, safe check-in to the locations of the EMG 2019 and the preparation of the accreditation card required for the check-in,
- enforcing the rightful interests of the parties in a legal relationship;
- compliance with the legal obligations concerning the Data Controllers.

### **2. Personal data categories concerned, scope of processed data**

The Data Controllers are entitled to become aware of and process the following personal data of the Volunteers for the purposes specified in Section IV/B.1:

- a) full name (first name and last name)
- b) full birth name
- c) birthplace (country, municipality), date
- d) address (country, ZIP code, city, street, number), place of residence
- e) citizenship
- f) mother's name
- g) ID card number or passport number
- h) in case of data subjects under the age of 16, the full name of the legal representative (in case of concluding a contract the full name of the legal representative of data subjects under the age of 18)
- i) telephone number
- j) e-mail address
- k) photograph
- l) Photograph and video footage about the Volunteer
- m) foreign language proficiency
- n) clothing size
- o) gender
- p) data concerning having a driver's license
- q) special data: healthcare data, food allergies, food sensitivity

### **3. Legal basis for data processing:**

Based on Article 6, Section (1), Sub-section f) of the GDPR the legal basis for the data processing concerning the Volunteers is the rightful interest of the Data Controllers as Organizers to:

- comply with the requirements, provisions required by the European Maccabi Confederation concerning the EMG 2019,

- involve volunteers in the organization of the EMG 2019,
- implement the security and other provisions concerning the check-in procedure to the EMG 2019 and the locations of the EMG 2019 by the Data Controllers as Organizers,
- exercise the broadcast rights of the Data Controllers concerning the EMG 2019, by which they can broadcast the EMG 2019 to the public, providing news about it, preparing reports, document it with photographs and video footage, thereby promoting the EMG 2019 and the Maccabi events.

Concerning the enforcement of the rightful interest of the Organizers the rights and liberties of the data subjects which make the protection of personal data necessary were considered. In this regard the Data Controllers considered that the scope of the processed personal data was determined in part based on an official request, and in part according to the process of accreditation and organizing the EMG 2019. All personal data named in Section 2 will only be used by the Organizers in connection with the activity of the data subject performed for the EMG 2019 to the extent and for the period necessary for the purpose of the data processing.

Considering that the processing of personal data is essential concerning the activity of the data subject performed in the course of the EMG 2019 and that the personal data will be processed expressly and exclusively with regards to the volunteer activity of the data subjects in the EMG 2019, the Organizers came to the conclusion that there are no circumstances concerning the use of the legal basis for data processing according to Article 6, Section (1), Subsection f) of the GDPR concerning which the rights and liberties of the data subjects would enjoy preference over the exercise of the rightful interests of the Organizers as data controllers in a manner excluding data processing.

An additional legal basis for data processing is the performance of the contract concluded with the Volunteers according to Article 6, Section (1), Subsection b) of the GDPR:

- the ability to assign tasks to the Volunteers according to their abilities, foreign language proficiencies,
- the ability to communicate with the Volunteers,
- the ability to confirm the application of the Volunteer to the EMG 2019,
- the ability to provide catering and uniforms for the Volunteers.

A further legal basis for data processing is compliance with the legal obligation concerning Data Controllers pursuant to Article 6, Section (1), Subsection c) of the GDPR arising in connection with guaranteeing the adequate level of security for the EMG 2019.

In the case of special data the legal basis for data processing are Subsection h) of Article 9, Section (2) of the GDPR, considering that in order to grant special requests concerning catering it is necessary to know the relevant healthcare data.

Additionally, the legal basis for data processing is the consent of the Volunteer (GDPR, Article 6, Section (1), Sub-section a), Article 9, Section (2), Sub-section a)). The Volunteer gives their consent when registering online for the EMG 2019 by checking the box before the text “*I state that I consent to the processing of my personal data and accept the Data Protection Information*” and submitting the registration by clicking the “I register” button.

<b>Legal basis for the data processing performed by the Data Controllers – summary table</b>				
<b>Personal data</b>	<b>Legal basis – per data processing goal</b>			
	<b>Rightful interest</b>	<b>Legal obligation</b>	<b>Consent</b>	<b>Contract performance</b>
full name (first name and last name)	x	x		x
full birth name		x		x

place (country, municipality), date of birth		x		x
address (country, ZIP code, town, street, number), place of residence		x		
citizenship		x		x
mother's name		x		x
number of ID card / passport		x		
in case of data subjects under the age of 18, the full name of the legal representative		x		
telephone number	x	x		
email address	x	x		
photograph	x			
Photograph and video footage about the Volunteer	x		x	
foreign language proficiency	x			x
clothing size				x
gender	x			
information concerning having a driver's license	x		x	
<b>Special personal data</b>	<b>Legal basis</b>			
	<b>GDPR Article 9, Section (2), Sub-section h)</b>		<b>Consent</b>	
healthcare data		x		x

#### 4. Period of data processing:

The Data Controllers shall process the personal data of the Volunteer processed in connection with the performance of the contract concluded with the Volunteer from the application of the Volunteer for the EMG 2019 until the end of a period of 5 years following the termination of the legal relationship as a volunteer.

The Data Controllers are processing the personal data of the Volunteers processed for other data processing purposes from the uploading of such data to the online accreditation system of the EMG 2019 until the end of a period of 3 business days following the EMG 2019, provided that the authority authorized to do so does not request the Data Controllers to keep the personal data for a specific additional time.

#### 5. Data transferring

The Data Controllers only transfer the data of the Volunteers to third parties in the following cases:

- a) if the data transfer is required by legal regulations (in particular if the court, authority or other organ as the recipient of the data transfer delivers an official inquiry to the Data Controllers);
- b) Based on the Hungarian legal regulations (Act 125/1995 on the national security services and Act 34/1994 on the police force) the Data Controllers are obliged to hand over, transfer specific personal data of the data subjects to the Hungarian counter-terrorism organization (Counter Terrorism Centre) in order to guarantee the appropriate level of security for the EMG 2019;

- c) the name, portrait of the data subject and the data assigned to their accreditation clearance level are forwarded to the company manufacturing the accreditation cards (GT Bt., and Informsped Kft.) in order to issue the accreditation card;
- d) the data necessary for providing transportation, other services will be transferred to the partner of the Data Controllers providing transportation, other services in order to provide the services in question;
- e) If it becomes necessary, the Data Controllers may transfer the data to the organizing authority performing the check-in.

## 6. Rights of the Volunteers

If the Volunteer intends to exercise their rights under the GDPR concerning the data processing performed by the Data Controllers, they can do so in writing, in English or Hungarian language. If the Volunteer is under the age of 16, their rights can be exercised by their legal representative.

The Volunteers are entitled to the following rights from the rights of the data subjects specified in Section V of the Regulation, considering the legal basis for the data processing:

Right	Performance of the legal obligation	Rightful interest	Consent	Contract performance
access to personal data and information concerning data processing	x	x	x	x
right to portability concerning the provided data			x	
right to erasure		x	x	x
right to restriction	x	x	x	x
right to rectification	x	x	x	x
right to objection		x	x	
revocation of consent			x	
Right to turn to the authorities or the court	x	x	x	x

## IV/C. Data processing performed in connection with the personal data of madriches

Data processing discussed in this section concerns the Madriches, that is, natural persons who perform tasks as madriches in the course of the EMG 2019 and with whom EMG 2019 SPORT Kft. concluded a contract for performing madrich activities.

### 1. Purpose of the data processing:

The purpose of the data processing performed by the Data Controllers in connection with the Madriches is the following in particular:

- conclusion and maintenance of the contractual legal relationship aimed at the employment of the Madriches, exercising rights and performing obligations (e. g. payment of benefits) under such legal relationships, termination of the legal relationship;
- informing the public about the EMG 2019, providing news;
- accreditation for the EMG 2019, safe check-in to the locations of the EMG 2019 and the preparation of the accreditation card required for the check-in,
- granting special requests concerning catering,

- providing uniform for the Madriches,
- enforcing the rightful interests of the parties in a legal relationship;
- compliance with the legal obligations concerning the Data Controllers.

## 2. **Personal data categories concerned, scope of processed data**

The Data Controllers are entitled to become aware of and process the following personal data of the Madriches for the purposes specified in Section IV/C.1:

- a) full name (first name and last name)
- b) full birth name
- c) birthplace (country, municipality), date
- d) address (country, ZIP code, city, street, number), place of residence
- e) citizenship
- f) mother's name
- g) ID card number or passport number
- h) Hungarian social security identification number (TAJ number)
- i) tax identification number
- j) telephone number
- k) email address
- l) photograph
- m) Photograph and video footage about the Madrich
- n) foreign language proficiency
- o) clothing size
- p) gender
- q) information concerning having a driver's license
- r) special data: healthcare data, food allergies, food sensitivity

## 3. **Legal basis for data processing:**

Based on Article 6, Section (1), Sub-section f) of the GDPR the legal basis for the data processing concerning the Madriches is the rightful interest of the Data Controllers as Organizers to:

- comply with the requirements, provisions required by the European Maccabi Confederation concerning the EMG 2019,
- involve Madriches in the organization of the EMG 2019, to provide Madriches for the junior participants of the EMG 2019 according to the customs, provisions of the Maccabi Games,
- assign the Madriches to a delegation the members of which the Madrich can communicate with according to their foreign language proficiency,
- implement the security and other provisions concerning the check-in procedure to the EMG 2019 and the locations of the EMG 2019 by the Data Controllers as Organizers,
- exercise the broadcast rights of the Data Controllers concerning the EMG 2019, by which they can broadcast the EMG 2019 to the public, providing news about it, preparing reports, document it with photographs and video footage, thereby promoting the EMG 2019 and the Maccabi events.

Concerning the enforcement of the rightful interest of the Organizers the rights and liberties of the data subjects which make the protection of personal data necessary were considered. In this regard the Data Controllers considered that the scope of the processed personal data was determined in part based on an official request, and in part according to the process of accreditation and organizing the EMG 2019. All personal data named in Section 2 will only be used by the Organizers in connection with the activity of the data subject performed for the EMG 2019 to the extent and for the period necessary for the purpose of the data processing.

Considering that the processing of personal data is essential concerning the activity of the data subjects performed in the course of the EMG 2019 and that the personal data will be processed expressly and exclusively with regards to the activity of the data subjects as Madriches in the EMG 2019, the Organizers came to the conclusion that there are no circumstances concerning the use of the legal basis for data processing according to Article 6, Section (1), point f) of the GDPR concerning which the rights and liberties of the data subjects would enjoy preference over the

exercise of the rightful interests of the Organizers as data controllers in a manner excluding data processing.

An additional legal basis for data processing is the performance of the contract concluded with the Madriches according to Article 6, Section (1), Subsection b) of the GDPR:

- the ability to communicate with the Madriches,
- the ability to provide catering and uniforms for the Madriches.

A further legal basis for data processing is compliance with the legal obligation concerning Data Controllers pursuant to Article 6, Section (1), Subsection c) of the GDPR occurring in connection with guaranteeing the adequate level of security for the EMG 2019.

In the case of special data the legal basis for data processing is Subsection h) of Article 9, Section (2) of the GDPR, considering that in order to grant special requests concerning catering it is necessary to know the relevant healthcare data.

Additionally, the legal basis for data processing is the consent of the Madrich (GDPR, Article 6, Section (1), Sub-section a), Article 9, Section (2), Sub-section a)). The Madrich gives their consent when registering for the EMG 2019 with a paper-based form *by signing the statement of consent*.

<b>Legal basis for the data processing performed by the Data Controllers – summary table</b>				
<b>Personal data</b>	<b>Legal basis – per data processing goal</b>			
	<b>Rightful interest</b>	<b>Legal obligation</b>	<b>Consent</b>	<b>Contract performance</b>
full name (first name and last name)	x	x		x
full birth name		x		x
place (country, municipality), date of birth		x		x
address (country, ZIP code, town, street, number), place of residence		x		x
citizenship		x		x
mother's name		x		x
number of ID card / passport and copies made of such documents		x		x
Hungarian social security identification number (TAJ number) and the copy of the official certificate				x
tax identification number and the copy of the official certificate				x
telephone number	x	x		
email address	x	x	x	
photograph	x			

Photograph and video footage about the Madrich	x		x	
foreign language proficiency	x			x
clothing size				x
gender	x			
information concerning having a driver's license	x		x	
<b>Special personal data</b>	<b>Legal basis</b>			
	<b>GDPR Article 9, Section (2), Sub-section h)</b>		<b>Consent</b>	
healthcare data	x		x	

#### 4. Period of data processing:

The Data Controllers shall process the personal data of the Madriches processed in connection with the performance of the contract concluded with the Madriches from the application of the Madrich for the EMG 2019 for 5 years following the termination of the legal relationship.

The Data Controllers are processing the personal data of the Madriches processed for other data processing purposes from the uploading of such data to the online accreditation system of the EMG 2019 until the end of a period of 3 business days following the EMG 2019, provided that the authority authorized to do so does not request the Data Controllers to keep the personal data for a specific additional time.

#### 5. Data transferring

The Data Controllers only transfer the data of the Madriches to third parties in the following cases:

- a) if the data transfer is required by legal regulations (in particular if the court, authority or other organ as the recipient of the data transfer delivers an official inquiry to the Data Controllers);
- b) Based on the Hungarian legal regulations (Act 125/1995 on the national security services and Act 34/1994 on the police force) the Data Controllers are obliged to hand over, transfer specific personal data of the data subjects to the Hungarian counter-terrorism organization (Counter Terrorism Centre) in order to guarantee the appropriate level of security for the EMG 2019;
- c) the name, portrait of the data subject and the data assigned to their accreditation clearance level are forwarded to the company manufacturing the accreditation cards (GT Bt., and Informsped Kft.) in order to issue the accreditation card;
- d) the data necessary for providing transportation, other services will be transferred to the partner of the Data Controllers providing transportation, other services in order to provide the services in question.
- e) If it becomes necessary, the Data Controllers may transfer the data to the organizing authority performing the check-in.
- f) if transferring data is necessary for the performance of the contractual obligations of the Data Controllers under a sponsorship contract established between the Data Controllers and the organization sponsoring them (in particular: Ministry of Human Capacities, Ministry for Innovation and Technology, and the legal predecessors, successors of the same).

#### 6. Rights of the Madriches

If the Madrich intends to exercise their rights under the GDPR concerning the data processing performed by the Data Controllers, they can do so in writing, in English or Hungarian language.

The Madriches are entitled to the following rights from the rights of the data subjects specified in Section V of the Regulation, considering the legal basis for the data processing:

<b>Right</b>	<b>Performance of the legal obligation</b>	<b>Rightful interest</b>	<b>Consent</b>	<b>Contract performance</b>
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access to personal data and information concerning data processing	x	x	x	x
right to portability concerning the provided data			x	
right to erasure		x	x	x
right to restriction	x	x	x	x
right to rectification	x	x	x	x
right to objection		x	x	
revocation of consent			x	
Right to turn to the authorities or the court	x	x	x	x

#### IV/D. Data processing concerning press employees

Data processing discussed in this section concerns Press Employees, that is, natural persons registering for the EMG 2019 as press employees on the online EMG 2019 accreditation interface provided for the media by the Organizers.

##### 1. Purpose of the data processing:

The purpose of the data processing performed by the Data Controllers in connection with the press employees is the following in particular:

- informing the public about the EMG 2019, providing news;
- accreditation for the EMG 2019, safe check-in to the locations of the EMG 2019 and the preparation of the accreditation card required for the check-in,
- online conducting of press accreditation, so that the Data Controllers as organizers can check whether the applicant can meet the requirements for press accreditation, and check that the accredited media provide information about the EMG 2019 according to Article 10 of Act 104/2010 on the fundamental rules of media content and Article 11 of the Charter of Fundamental Rights of the European Union;
- enforcing and protecting the rightful interests of the Data Controllers,
- compliance with the legal obligations concerning the Data Controllers.

##### 2. Personal data categories concerned, scope of processed data

The Data Controllers are entitled to become aware of and process the following personal data of the Press Employees for the purposes specified in Section IV/D.1:

- a) full name (first name and last name)
- b) birth name
- c) place (country, municipality), date of birth
- d) citizenship
- e) address (country, ZIP code, town, street, number), place of residence
- f) mother's name
- g) number of ID card / passport
- h) telephone number
- i) email address
- j) photograph
- k) Photograph and video footage about the Press Employee
- l) other data: position; data concerning whether the press employee is a freelancer or an employee of some medium (in which case the name of the medium is required); indication of the sports, delegations and locations the press employee is interested in; possible special requests



### 3. Legal basis for data processing:

Based on Article 6, Section (1), Sub-section f) of the GDPR the legal basis for the data processing concerning the Press Employees is the rightful interest of the Data Controllers as Organizers to:

- comply with the requirements, provisions required by the European Maccabi Confederation concerning the EMG 2019,
- to inform the public about the EMG 2019 through as many forms of media as possible, for which purpose it is the rightful interest of the Data Controllers that the press employees are personally present as much as possible at the specific events, locations of the EMG 2019,
- exercise the broadcast rights of the Data Controllers concerning the EMG 2019, by which they can broadcast the EMG 2019 to the public, providing news about it, preparing reports, document it with photographs and video footage, thereby promoting the EMG 2019 and the Maccabi events,
- implement the security and other provisions concerning the check-in procedure to the EMG 2019 and the locations of the EMG 2019 by the Data Controllers as Organizers,
- issue the accreditation card for the Press Employee granting entry to the event locations of the sports they prefer and/or the event locations they prefer,
- confirm the registration for the Press Employee and to communicate with the Press Employee.

Concerning the enforcement of the rightful interest of the Organizers the rights and liberties of the data subjects which make the protection of personal data necessary were considered. In this regard the Data Controllers considered that the scope of the processed personal data was determined in part based on an official request, and in part according to the process of accreditation and organizing the EMG 2019. All personal data named in Section 2 will only be used by the Organizers in connection with the activity of the data subject performed in connection with the EMG 2019 to the extent and for the period necessary for the purpose of the data processing.

Considering that the processing of personal data is essential concerning the activity of the data subjects performed in the course of the EMG 2019 and that the personal data will be processed expressly and exclusively with regards to the activity of the data subjects as press employees in the EMG 2019, the Organizers came to the conclusion that there are no circumstances concerning the use of the legal basis for data processing according to Article 6, Section (1), Subsection f) of the GDPR concerning which the rights and liberties of the data subjects would enjoy preference over the exercise of the rightful interests of the Organizers as data controllers in a manner excluding data processing.

A further legal basis for data processing is compliance with the legal obligation concerning Data Controllers pursuant to Article 6, Section (1), Subsection c) of the GDPR.

Additionally, the legal basis for data processing is the consent of the Press Employee (GDPR, Article 6, Section (1), Subsection a)). The press Employee gives their consent when registering online for the EMG 2019 as a press employee by checking the box before the text *“I state that I read and understood the Data Protection Information prepared for press employees and consent to the processing of my personal data”* and submitting the registration by clicking the *“Send”* button.

<b>Legal basis for the data processing performed by the Data Controllers – summary table</b>			
<b>Personal data</b>	<b>Legal basis – per data processing goal</b>		
	<b>Rightful interest</b>	<b>Legal obligation</b>	<b>Consent</b>
full name (first name and last name)	x	x	
full birth name		x	
place (country, municipality), date of birth		x	

address (country, ZIP code, town, street, number), place of residence		x	
mother's name		x	
citizenship		x	
number of ID card / passport		x	
telephone number		x	
email address	x	x	x
in case of data subjects under the age of 16, the full name of the legal representative		x	
photograph	x		
Photograph and video footage about the Press Employee	x		x
other data: position; data concerning whether the press employee is a freelancer or an employee of some medium (in which case the name of the medium is required); indication of the sports, delegations and locations the press employee is interested in; possible special requests	x		x

#### 4. Period of data processing:

The Data Controllers shall process the personal data of the Press Employees from the application of the Press Employee for the EMG 2019 until the end of a period of 3 business days following the EMG 2019, provided that the authority authorized to do so does not request the Data Controllers to keep the personal data for a specific additional time.

#### 5. Data transferring

The Data Controllers only transfer the data of the Press Employees to third parties in the following cases:

- if the data transfer is required by legal regulations (in particular if the court, authority or other organ as the recipient of the data transfer delivers an official inquiry to the Data Controllers);
- Based on the Hungarian legal regulations (Act 125/1995 on the national security services and Act 34/1994 on the police force) the Data Controllers are obliged to hand over, transfer specific personal data of the data subjects to the Hungarian counter-terrorism organization (Counter Terrorism Centre) in order to guarantee the appropriate level of security for the EMG 2019;
- the name, portrait of the data subject and the data assigned to their accreditation clearance level are forwarded to the company manufacturing the accreditation cards (GT Bt., and Informsped Kft.) in order to issue the accreditation card;
- If it becomes necessary, the Data Controllers may transfer the data to the organizing authority performing the check-in.

#### 6. Rights of the Press Employees

If the Press Employees intend to exercise their rights under the GDPR concerning the data processing performed by the Data Controllers, they can do so in writing, in English or Hungarian language.

The Press Employees are entitled to the following rights from the rights of the data subjects specified in Section V of the Regulation, considering the legal basis for the data processing:

Right	Performance of the legal obligation	Rightful interest	Consent
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access to personal data and information concerning data processing	x	x	x
right to portability concerning the provided data			x
right to erasure		x	x
right to restriction	x	x	x
right to rectification	x	x	x
right to objection		x	x
revocation of consent			x
Right to turn to the authorities or the court	x	x	x

#### IV/E. Data processing concerning other accredited persons

Data processing discussed in this section concerns Other accredited persons, that is, natural persons who:

- a) are performing tasks and contribute to such tasks for the contractual performance of tasks, obligations accepted in works, agency, lease or other contracts on providing services concluded directly or indirectly (under a contract concluded with the contractual partner of the Organizers) by and between the Data Controllers as Organizers and third parties (lessors, contractors, manufacturers, etc.), including in particular the following:
  - employees, agents, workers of the third party (lessor, contractor, manufacturer, etc.),
  - employees, agents, workers of the subcontractors of the third party (lessor, contractor, manufacturer, etc.) involved in the performance of tasks.
- b) employees, officials, agents, workers of organizations belonging to categories subject to accreditation based on the decision of the Data Controllers or their agreement with the Data Controllers.

##### 1. Purpose of the data processing:

The purpose of the data processing performed by the Data Controllers in connection with Other accredited persons is the following in particular:

- accreditation for the EMG 2019, safe check-in to the locations of the EMG 2019 and the preparation of the accreditation card required for the check-in;
- safe check-in of partners, implementing security and other provisions, guaranteeing the conditions for performing work;
- compliance with the legal obligations concerning the Data Controllers.

##### 2. Personal data categories concerned, scope of processed data

The Data Controllers are entitled to become aware of and process the following personal data of the Other accredited persons for the purposes specified in Section IV/E.1:

- a) full name (first name and last name)
- b) birth name
- c) place (country, municipality), date of birth
- d) address (country, ZIP code, town, street, number), place of residence
- e) mother's name
- f) number of ID card / passport
- g) citizenship
- h) telephone number
- i) email address
- j) image of the data subject for issuing the accreditation card
- k) gender of the data subject

##### 3. Legal basis for data processing:

Based on Article 6, Section (1), Subsection f) of the GDPR the legal basis for the data processing concerning the Other accredited persons is the rightful interest of the Data Controllers as Organizers to:

- comply with the requirements, provisions required by the European Maccabi Confederation concerning the EMG 2019,
- implement the security and other provisions concerning the check-in procedure of their partners to the EMG 2019 organized by the Data Controllers, help the activities of their partners and have the personal data of the contributors, partners at the ready.

Concerning the enforcement of the rightful interest of the Organizers the rights and liberties of the data subjects which make the protection of personal data necessary were considered. In this regard the Data Controllers considered that the scope of the processed personal data was determined in part based on an official request, and in part according to the process of accreditation and organizing the EMG 2019. All personal data named in Section 2 will only be used by the Organizers in connection with the activity of the data subject performed for the EMG 2019 to the extent and for the period necessary for the purpose of the data processing.

Considering that the processing of personal data is essential concerning the activity of the data subjects performed in the course of the EMG 2019 and that the personal data will be processed expressly and exclusively with regards to the activity of the data subjects concerning the EMG 2019, the Organizers came to the conclusion that there are no circumstances concerning the use of the legal basis for data processing according to Article 6, Section (1), Subsection f) of the GDPR concerning which the rights and liberties of the data subjects would enjoy preference over the exercise of the rightful interests of the Organizers as data controllers in a manner excluding data processing.

A further legal basis for data processing is compliance with the legal obligation concerning Data Controllers pursuant to Article 6, Section (1), Subsection c) of the GDPR.

<b>Legal basis for the data processing performed by the Data Controllers – summary table</b>		
<b>Personal data</b>	<b>Legal basis – per data processing goal</b>	
	<b>Rightful interest</b>	<b>Legal obligation</b>
full name (first name and last name)	x	x
full birth name		x
place (country, municipality), date of birth		x
address (country, ZIP code, town, street, number), place of residence		x
mother's name		x
citizenship		x
number of ID card / passport		x
telephone number		x
email address		x
image for issuing the accreditation card	x	
gender	x	

#### **4. Period of data processing:**

In the absence of a request concerning the keeping of the data, the Data Controllers delete data recorded in order to ensure the check-in and work performance at the end of a period of 3 business days following the EMG 2019 provided that the authority authorized to do so does not request the Data Controllers to keep the personal data for a specific additional time.

## 5. Data transferring

The Data Controllers only transfer the data of the Other accredited persons to third parties in the following cases:

- a) if the data transfer is required by legal regulations (in particular if the court, authority or other organ as the recipient of the data transfer delivers an official inquiry to the Data Controllers);
- b) Based on the Hungarian legal regulations (Act 125/1995 on the national security services and Act 34/1994 on the police force) the Data Controllers are obliged to hand over, transfer specific personal data of the data subjects to the Hungarian counter-terrorism organization (Counter Terrorism Centre) in order to guarantee the appropriate level of security for the EMG 2019;
- c) the name, portrait of the data subject and the data assigned to their accreditation clearance level are forwarded to the company manufacturing the accreditation cards (GT Bt., and Informsped Kft.) in order to issue the accreditation card;
- d) If it becomes necessary, the Data Controllers may transfer the data to the organizing authority performing the check-in.

## 6. Rights of the Other accredited persons

If the Other accredited persons intend to exercise their rights under the GDPR concerning the data processing performed by the Data Controllers, they can do so in writing, in English or Hungarian language.

The Other accredited persons are entitled to the following rights from the rights of the data subjects specified in Section V of the Regulation, considering the legal basis for the data processing:

Right	Performance of the legal obligation	Rightful interest
access to personal data and information concerning data processing	x	x
right to portability concerning the provided data		
right to erasure		x
right to restriction	x	x
right to rectification	x	x
right to objection		x
revocation of consent		
Right to turn to the authorities or the court	x	x

## V. Rights of the data subjects

### V/A. Information and access to personal data

1. Where personal data relating to a data subject are collected from the data subject, then at the time when personal data are obtained, and where personal data have not been obtained from the data subject, then within a reasonable deadline from obtaining the personal data but within one month at the latest, and if the personal data are to be used for communication with the data subject, then at the latest at the time of the first communication to that data subject the controller shall provide the data subject with the following information:
  - a) the identity and the contact details of the controller;
  - b) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
  - c) the categories of data subjects and personal data concerned;

- d) in the case of data transfer its recipient, its legal basis and the scope of the transferred data;
  - e) the period for which the personal data will be stored;
  - f) from which source the personal data originate;
  - g) the manner of data processing (manual or automated);
  - h) the measures taken to ensure the safety of personal data;
  - i) the rights of data subjects and how the data subject can exercise the same.
2. The Data Controllers are entitled to comply with their information obligation specified in Section V/ A. 1. by publishing the data protection information, data protection regulation on the websites [www.emg2019.hu](http://www.emg2019.hu), [www.emg2019.com](http://www.emg2019.com) and/or in the online accreditation system of the EMG 2019, and orally, in writing, or in other manners suitable for providing information. If the data subject requests specific information from the Data Controllers concerning the processing of their personal data, then the Data Controllers shall answer such a request immediately but within 30 days at the latest by providing customized information specifically indicating the data processing concerning the data subject. In special cases – considering the complexity of the request and the number of requests – the deadline of 30 days can be extended by the Data Controllers with an additional 60 days.

#### **V/B. Right to rectification**

1. If the Data Controllers process any personal data of the data subject in an inaccurate or deficient manner, the data subject can request the Data Controllers to immediately rectify the inaccurately processed personal data or immediately complete the deficient personal data based on the data provided and certified by the data subject.
2. The data subject (or their certified agent acting on their behalf) can submit their request for rectification by appropriately filling in *Annex 1* or making a statement with the same content and sending it to the Data Controllers. If a public document (e.g. an official certificate) contains the personal data, then the applicant shall present the public document certifying the content of the personal data or hand its copy over to the Data Controllers.

#### **V/C. Right to erasure**

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her from every archive of the Data Controllers. After receiving such a request the Data Controllers shall have the obligation to erase the personal data requested to be erased without undue delay where one of the following grounds applies:
  - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - b) the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
  - c) it gets proven that the personal data have been unlawfully processed;
  - d) the personal data have to be erased for compliance with a legal obligation to which the Data Controllers are subject.
2. The data subject can submit their request for erasure by appropriately filling in *Annex 2* or making a statement with the same content and sending it to the Data Controllers.
3. The Data Controllers may refuse to erase the personal data if any of the circumstances specified in Section 17 (3) of the GDPR applies.

#### **V/D. Right to restriction of processing**

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
  - a) 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; or
  - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; or
  - c) 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 defense of legal claims; or

- d) the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.
2. The data subject (or their certified agent acting on their behalf) can submit their request for restriction by appropriately filling in *Annex 3* or making a statement with the same content and sending it to the Data Controllers.
3. The Data Controllers are only entitled to store the personal data to be put under restriction. The personal data the processing of which has been restricted shall, with the exception of storage, only be processed with the data subject's prior written consent or for the establishment, exercise or defense of legal claims or for reasons of important public interest of the Union or of a Member State.
4. If the conditions for restricting the processing of personal data do not apply, then the Data Controllers lift the restriction and shall inform the data subject about this beforehand.

#### **V/E. Right to data portability**

1. Concerning personal data processed by the Data Controllers in an automated manner based on the consent of the data subject, the data subject can request from the Data Controllers to provide for the data subject (in electronic format) the personal data provided by the data subject, according to the specifications of Section 20 (1) of the GDPR.
2. When providing the collected and stored personal data in electronic format the Data Controllers shall consider that the data subject is entitled to hand over his or her collected and stored personal data provided in electronic format to another data controller or to ask the Data Controllers to send such personal data to another data controller directly.
3. The data subject (or their certified agent acting on their behalf) can submit their request for data portability by appropriately filling in *Annex 4* or making a statement with the same content and sending it to the Data Controllers.

#### **V/F. Right to object**

1. The data subject can object to the processing of their personal data by the Data Controllers, if the Data Controllers perform the processing in order to enforce the rightful interests of the Data Controllers or third parties.
2. The data subject (or their certified agent acting on their behalf) can submit their request concerning the objection by appropriately filling in *Annex 5* or making a statement with the same content and sending it to the Data Controllers.
3. After the acceptance of the statement of objection by the Data Controllers the Data Controllers are not entitled to process the personal data in question in order to enforce the rightful interests of the Data Controllers or third parties 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 defense of legal claims.

#### **VI. Data security and the order of storing data**

1. The Data Controllers perform the data processing so that besides adhering to the GDPR and other data protection legal regulations they respect the fundamental rights of the data subject to family and private life and the other rights and liberties of the data subject.
2. The provisions specified for the storage of personal data in this Regulation concern personal data stored in both physical and electronic form in its registration system and/or that the Data Controllers process in an automated manner in part or in full. The Data Controllers use devices owned by any of the Data Controllers for the electronic storage of the personal data; physical archives are kept, stored at the registered office of Magyar Testgyakorlók Köre Budapest.

3. Personal data collected and stored by Data Controllers for data processing can only be processed for purposes specified in this Regulation and in the relevant legal regulations, on the appropriate legal basis.
4. Personal data collected and stored by Data Controllers shall be kept by the Data Controllers during the period of data processing so that unauthorized persons cannot access such data. Data Controllers shall make sure that collected and stored personal data:
  - cannot be known or accessed by unauthorized third parties;
  - cannot be subject to unauthorized data processing;
  - cannot be altered, transferred, disclosed, erased by unauthorized persons;
  - cannot be transferred in any way other than what is specified herein;
  - cannot be altered in an unauthorized manner, cannot be erased, deleted, made unavailable accidentally or in an unauthorized manner;
  - is protected from loss and damage.
5. In the course of their data processing and the related organization activities the Data Controllers consider the actual status and developments of the science and the technology. They strive to apply the technology in order to maintain data security that is as secure as possible and provides data security appropriate for the amount of the risk in order to protect the rights and liberties of natural persons.
6. The Data Controllers take such appropriate technical and organizational measures when defining the manner of data processing and in the course of the data processing itself the purpose of which is the implementation of the principles of data protection.
7. The Data Controllers take appropriate technical and organizational measures to ensure that only such personal data are processed that are necessary for the specific data processing purpose in question with special regard to the amount of data, the extent of data processing, the term of their storage and their availability.

## **VII. Order of data transferring**

1. The Data Controllers are not entitled to transfer the personal data they process and store to another party or make it available in any other form, except:
  - a) if the data transfer is required by legal regulations;
  - b) if the court, authority or other organ as the recipient of the data transfer delivers an official inquiry to the Data Controllers;
  - c) if the data subject gave their express consent to the data transfer,
  - d) the recipient of the data transfer is a person obliged by the Data Controllers and the purpose of data transferring is the performance of the obligation between the data subject and the Data Controllers.
2. If the data transfer as specified in Section VII. 1. c) becomes necessary the Data Controllers shall inform the data subject:
  - a) the identity and the contact details of the recipient of the data transfer and of the representative of the same;
  - b) about the consent to having become aware of the information concerning the data transfer and to the data transfer;
  - c) the specific purpose and extent of the data transfer;
  - d) the rights the data subject is entitled to;
  - e) the option to submit a complaint to the Authority or a court legal remedy.

The statement of consent of the data subject consenting to a specific data transfer can be given simultaneously with the statement of consent concerning the data processing, if at the time of making that a statement it is known already that the specific data transfer will become necessary.

## **VIII. Protocol to be followed in the case of a data breach**

1. In accordance with Article 4, Section 12 of the GDPR a data breach is a security breach that can be:
  - a confidentiality breach, that is, unauthorized disclosure of or access to transferred, stored or otherwise processed personal data;



- access breach, that is, the accidental or illegal destruction, loss of transferred, stored or otherwise processed personal data;
  - integrity breach, that is, the alteration of transferred, stored or otherwise processed personal data.
2. If the executive, official, employee of the Data Controllers or another person in a legal relationship with the Data Controllers aimed at employment experiences that concerning the personal data collected and stored by the Data Controllers there is the potential of a security breach, such a person shall immediately notify the Data Controllers thereof (hereinafter: Report).

A security breach is a circumstance as the result of which a breach occurs in the data processing system, archives of the Data Controllers, in a manner contrary to the data security provisions. A security breach does not necessarily mean a data breach as well.

3. After making the Report the Data Controllers shall immediately investigate and assess the situation. The investigation shall extend to every aspect of the circumstance reported as a potential security breach and to investigating every registry the Report concerns and thus, the status of the personal data.
4. In the course of the investigation the Data Controllers shall primarily determine whether the security breach actually occurred. If the Data Controllers determine that security was not breached, then they cancel the procedure and make a report about the result of the investigation for the management of the Data Controllers and register the result in the records kept about data breaches.
5. If the Data Controllers determine that security was breached, then, secondly, they shall investigate whether a data breach occurred. If the Data Controllers determine that no data breach occurred, then they shall take every measure necessary to restore security and then cancel the procedure and make a report about the result of the investigation for the management of the Data Controllers and register the result in the records kept about data breaches.
6. If the Data Controllers determine that simultaneously with the security breach a data breach also occurred, then in the third place they shall investigate whether the data breach poses a risk concerning the rights and liberties of the data subjects concerned. If they determine that the data breach does not pose such a risk, then they shall take every measure necessary to restore security and then cancel the procedure and make a report about the result of the investigation for the management of the Data Controllers and register the result in the records kept about data breaches.
7. If the Data Controllers determine that simultaneously with the security breach the data breach also poses a risk concerning the rights and liberties of the data subjects concerned then the Data Controllers shall investigate the extent of such a risk.

If the data breach poses a risk concerning the rights and liberties of the data subjects concerned then they shall make a report about the result of the investigation for the management of the Data Controllers and register the result in the records kept about data breaches and inform the Authority and the data subjects concerned about the data breach.

8. The Data Controllers shall comply with the reporting obligation without undue delay but within 72 hours from becoming aware of the data breach at the latest. The Data Controller is considered to have become aware of the data breach if the Data Controllers can determine the occurrence of a security breach with the certainty required. After determining the occurrence of the security breach the Data Controllers shall immediately assess the situation.

If the Data Controllers cannot conduct the recorded investigation within 72 hours then they shall make the report or information within the deadline and shall continue the investigation. If the result of the investigation is available for the Data Controllers, then they shall make a supplementary report/ supplementary information or amending report/amending information thereof.

9. The Data Controllers shall comply with the reporting obligation by filling in the electronic form used by the Authority and sending it to the Authority or in the case of another member state data protection authority in the form specified by such an authority or member state law. The following data shall be provided in the report:
- the type of the data breach;
  - the category of data subjects involved in the data breach;
  - the (approximate) number of data subjects involved in the data breach;

- they type of personal data involved in the data breach;
  - the (approximate) number of personal data items involved in the data breach.
10. The Data Controllers shall make separate reports about a data breach concerning personal data in different data categories.
  11. The Data Controllers are not obliged to make a report if the data breach is not expected to pose risks concerning the rights and liberties of natural persons. The Data Controllers shall perform the assessment concerning the risk considering all the circumstances of the event. They shall prove and report the circumstance that the data breach poses no risk concerning the rights and liberties of natural persons and to take the measures necessary to restore security.
  12. The Data Controllers shall comply with the information obligation without undue delay. The Data Controllers shall evaluate the nature of the risk in the course of the investigation, considering all the circumstances of the event. In this regard the Data Controllers shall consider the following among others:
    - the type of the data breach;
    - they type of personal data involved in the data breach;
    - the sensitivity of the personal data involved in the data breach;
    - the extent of the personal data involved in the data breach;
    - the vulnerability of the natural person involved in the data breach.

The risk concerning the rights and liberties of the natural person posed by the data breach is considered high if the data subject can incur losses by it in the physical, financial or non-financial sense.

13. The Data Controllers shall inform the data subjects about the following:
  - the occurrence and nature of the data breach;
  - the names and contact details of the Data Controllers;
  - potential consequences of the data breach;
  - the measures taken by the Data Controllers to mitigate the high level of risk as the result of the data breach and to restore the situation before the incident.
14. The communication to the data subject by the Data Controllers shall be in clear and plain language relevant for the data subjects and without undue delay, using a communication channel through which the information will be received by the data subjects the fastest according to the assessment of the Data Controllers. The Data Controllers may even use several forms of communication simultaneously to perform their information obligation.
15. The Data Controllers may dismiss sending the information to the data subjects if
  - a) the data breach does not pose a high risk concerning the rights and liberties of the data subjects, because if for example personal data were disclosed to unauthorized persons, such a person cannot access such personal data (due to the encryption) and the data controller has copies of the personal data concerned;
  - b) as the result of measures taken immediately after becoming aware of the potential data breach the possibility of a high risk never arose;
  - c) the risk resulting from the data breach cannot be considered high for other reasons.
16. Simultaneously with performing their reporting and information obligation, after becoming aware of the result of the investigation, the Data Controllers shall immediately take every measure to terminate the data breach and the security breach. In this regard the Data Controllers – depending on their opportunities and the circumstances – shall restore the integrity, availability and confidentiality of the personal data involved in the data breach.

## **IX. Legal remedy**

1. If you have any questions, suggestions or possible complaints, please, contact the Data Controllers:

Mail address: 1440 Budapest, Pf. 93.; 1440 Budapest Pf. 93/5.  
 Telephone: +36-1-487-2500  
 E-mail: [adatvedelem@mtk1888.hu](mailto:adatvedelem@mtk1888.hu), [adatvedelem@emg2019.hu](mailto:adatvedelem@emg2019.hu)

2. If the data subject, concerning the processing of their personal data, experiences that the Data Controllers violate the provisions of the data protection legal regulations, then the data subject may turn to the competent court or the Hungarian National Authority for Data Protection and Freedom of Information with a request for legal remedy in order to protect the rights of the data subject.

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

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: <http://naih.hu>

**X. Attachments**

**Attachment 1 – Request for rectification**

**REQUEST FOR RECTIFICATION**  
*ARTICLE 16 OF THE GDPR*

**To: Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft.**

**Budapest**  
**Salgótarjáni út 12-14.**  
**1087**

**Dear Data Controllers!**

I, the undersigned, \_\_\_\_\_ (name) (address: \_\_\_\_\_; place, date of birth: \_\_\_\_\_, mother's name: \_\_\_\_\_), as data subject, submit the following

**request**

to **Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft**, as joint data controllers (hereinafter: the **Data Controllers**).

I request the Hon. Data Controllers to **rectify or complete my personal data** processed by the Data Controllers and being **incorrect/deficient** as follows:

**PRESENTLY PROCESSED INCORRECT PERSONAL DATA:**

**RECTIFIED, COMPLETED PERSONAL DATA:**

**I attach** the copy of the document containing the correct personal data and serving to certify the rectification or complementation hereto.

**I request the Hon. Data Controllers to consider my above request.**

**Date:** \_\_\_\_\_

**Yours respectfully:**

**NAME:**

**SIGNATURE:**

**Attachment 2 – Request for erasure**

**REQUEST FOR ERASURE**  
*ARTICLE 17 OF THE GDPR*

**To: Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft.**

**Budapest  
Salgótarjáni út 12-14.  
1087**

**Dear Data Controllers!**

I, the undersigned, \_\_\_\_\_ (name) (address: \_\_\_\_\_; place, date of birth: \_\_\_\_\_, mother's name: \_\_\_\_\_), as data subject, submit the following

**request**

to **Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft**, as joint data controllers (hereinafter: the **Data Controllers**).

I request the Hon. Data Controllers **to immediately erase my personal data** processed by the Data Controllers and specified below **from all their registries**:

**PERSONAL DATA REQUESTED TO BE ERASED:**

**REASON FOR ERASURE:** *(INDICATE WHICHEVER IS APPLICABLE)*

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- c) it gets proven that the personal data have been unlawfully processed;
- d) the personal data have to be erased for compliance with a legal obligation to which the Data Controllers are subject.

**I request the Hon. Data Controllers to consider my above request.**

**Date:** \_\_\_\_\_

**Yours respectfully:**

**NAME:**

**SIGNATURE:**

**Attachment 3 – Request for the restriction of processing**

**REQUEST FOR THE RESTRICTION OF PROCESSING**  
*ARTICLE 18 OF THE GDPR*

**To: Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft.**

**Budapest  
Salgótarjáni út 12-14.  
1087**

**Dear Data Controllers!**

I, the undersigned, \_\_\_\_\_ (name) (address: \_\_\_\_\_; place, date of birth: \_\_\_\_\_, mother's name: \_\_\_\_\_), as data subject, submit the following

**request**

to **Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft**, as joint data controllers (hereinafter: the **Data Controllers**).

I request the Hon. Data Controllers **to restrict the processing of my personal data** processed by the Data Controllers and specified below:

**PERSONAL DATA INVOLVED IN THE RESTRICTION OF PROCESSING:**

**REASON:** *(INDICATE WHICHEVER IS APPLICABLE)*

- a) The accuracy of the personal data is contested by the data subject.
- b) The processing is unlawful and the data subject opposes the erasure of the personal data.
- c) 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 defense of legal claims.
- d) The data subject has objected to processing, and it is necessary to determine whether the legitimate grounds of the controller override those of the data subject.

**I request the Hon. Data Controllers to consider my above request.**

**Date:** \_\_\_\_\_

**Yours respectfully:**

**NAME:**

**SIGNATURE:**

**Attachment 4 – Request for data portability**

**REQUEST FOR DATA PORTABILITY**  
*ARTICLE 20 OF THE GDPR*

**To: Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft.**

**Budapest  
Salgótarjáni út 12-14.**

1087

**Dear Data Controllers!**

I, the undersigned, \_\_\_\_\_ (name) (address: \_\_\_\_\_; place, date of birth: \_\_\_\_\_, mother's name: \_\_\_\_\_), as data subject, submit the following

**request**

to **Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft**, as joint data controllers (hereinafter: the **Data Controllers**).

I request the Hon. Data Controllers **to release my personal data** processed by the Data Controllers and specified below **for data portability purposes**:

**PERSONAL DATA SUBJECT TO DATA PORTABILITY:**

**REASON:** (INDICATE WHICHEVER IS APPLICABLE):

The Data Controllers process the personal data based on my CONSENT/PERFORMANCE OF A CONTRACT.

I state that the portability of my data does not affect the rights and liberties of other persons negatively.

**I request the Hon. Data Controllers to consider my above request and to release my requested personal data TO ME/TO A THIRD PARTY (*underline whichever is applicable*) in an articulated, widely used, machine-readable format.**

**In case of a third party, its name, address, email address:**

\_\_\_\_\_

**Date:** \_\_\_\_\_

**Yours respectfully:**

**NAME:**

**SIGNATURE:**

**Attachment 5 – Objection**

**OBJECTION**  
*ARTICLE 21 OF THE GDPR*

**To: Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft.**

**Budapest**  
**Salgótarjáni út 12-14.**  
**1087**

**Dear Data Controllers!**

I, the undersigned, \_\_\_\_\_ (name) (address: \_\_\_\_\_; place, date of birth: \_\_\_\_\_, mother's name: \_\_\_\_\_), as data subject, submit the following

**objection**

to **Magyar Testgyakorlók Köre Budapest and EMG 2019 SPORT Kft**, as joint data controllers (hereinafter: the **Data Controllers**) against the data processing performed by the Data Controllers as follows:

**PERSONAL DATA SUBJECT TO THE OBJECTION:**

**REASON:** *(INDICATE WHICHEVER IS APPLICABLE)*

- a) Enforcement of the rightful interests of the Data Controllers or a third party.
- b) Direct marketing.

**I request the Hon. Data Controllers to consider my above request and stop processing the indicated personal data for the purpose indicated in the reason provided above.**

**Date:** \_\_\_\_\_

**Yours respectfully:**

**NAME:**

**SIGNATURE:**