

Budapest Association for International Sports

(Legal Seat: 1094 Budapest, Ferenc tér 2-3. VII / 2, Registered by the Metropolitan Court of Budapest, Registration number: 01-02-0016742, Tax number: 18946426-1-43, Statistical number: 18946426-8551-529-01, Email: wemovebudapest@gmail.com)



Effective as of 19.03.2018

DATA PROTECTION AND PRIVACY POLICY

Chapter I: Purpose and goals of the Policy

1. The purpose of the present Policy is that the Budapest Association for International Sport (hereinafter referred to as the Association) regulates in a single document the processing and transfer of personal data made available to the Association by any natural person, legal entity and non-legal entity. The Policy is in compliance with the 2016/679 Regulation of the European Parliament and of the Council (the "Regulation") and the Act CXIII of 2011 on the Right of Information Self-Determination and Freedom of Information law (hereinafter: Information Act).

2. The Policy is subject to change at any time and is accessible to anyone.

Chapter II: Scope of the Policy

1. The personal scope of the Policy extends to the Association as a data controller, a member of the Association, employees, clients and volunteers.

2. The President of the Association shall ensure that the members of the Association, the employees and the volunteers are fully acquainted, mastered and properly apply the provisions of the Policy.

3. The Policy is effective as of 19. March 2018.

Chapter III: Definitions

For the purposes of this Policy, the terms used therein shall be interpreted as follows:

1. **data set:** all data processed in the same filing system;

2. **data processing:** performing technical tasks related to data processing operations, irrespective of the method and means used to carry out the operations and the place of application, provided that the technical task is performed on the data;

3. **data processor:** any natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;

4. **data management:** any operation or combination of operations, whether automated or not, performed on personal data or data files, such as collection, recording, systematization, segmentation, storage, transformation or alteration, retrieval, access, use, communication, dissemination or otherwise by item, alignment or connection, restriction, deletion or destruction;

5. **restriction of data management:** marking of stored personal data in order to limit their future processing;

6. **data controller:** the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes

and means of data processing are determined by Union or Member State law, the controller or the specific criteria for designating the controller may be defined by Union or Member State law;

7. **data designation:** the identification of the data to distinguish it;
8. **data destruction:** the complete physical destruction of the data carrier containing the data;
9. **data transfer:** making data available to a specific third party;
10. **data erasure:** making data unrecognizable in such a way that it is no longer possible to recover it;
11. **privacy Incident:** a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access of personal data transmitted, stored or otherwise processed;
12. **data lock:** the identification of the data with the purpose of limiting its further processing for a definite or definite period of time;
13. **employee:** a member of the family of an employee and a helper who is employed by the Association under the Labor Code;
14. **data subject's consent:** the voluntary, explicit and unambiguous expression of the data subject's will by expressing their consent to the processing of personal data concerning them by means of a declaration or an act unambiguously confirming the data subject;
15. **data subject:** a natural person client whose personal data is processed by the Association;
16. **Supervisory Authority:** National Data Protection and Freedom of Information Authority (contact details: 1530 Budapest, Pf. 5, address: 1125 Budapest, Erzsébet Szilágyi fasor 22 / C., Phone: + 36-1-391-1400, fax: + 36- 1-391-1410, Email: ugyfelszolgalat@naih.hu, Website: www.naih.hu)
17. **third party:** any natural or legal person, public authority, agency or any other body which is not the data subject, the controller, the processor or the persons authorized to process personal data under the direct control of the controller or processor;
18. **third country:** a country outside the European Union;
19. **member of the association:** who is on the list of members of the Association;
20. **legal person:** an entity having absolute legal capacity;
21. **non-legal entity:** non-legal entity and non-natural person legal entity;
22. **special personal data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic and biometric data intended to uniquely identify natural persons, health data, and sexual orientation or sexual orientation of natural persons data.
23. **international organization:** an organization governed by public international law, or any subsidiary thereof, or any other body which is or has been concluded by agreement between two or more States;
24. **public data:** data recorded in a public register kept by a public authority / court (eg data in the real estate register, data in the business register);
25. **disclosure:** making the data available to anyone;
26. **filing system:** any set of personal data, whether centralized, decentralized or functional or geographical, accessible by specified criteria;

27. **volunteer:** a person who performs activities for the Association without payment and is not a member of the Association at the same time;
28. **profiling:** profiling: any form of automated processing of personal data that involves the evaluation of certain personal attributes of a natural person, in particular those related to work performance, financial status, health, personal preferences, interest, reliability, behavior, whereabouts, or movement used for analysis or forecasting;
29. **personal data:** any information relating to an identified or identifiable natural person (data subject); identifies a natural person who, directly or indirectly, in particular has an identifier, such as: name, number, positioning data, online identification or one or more factors relating to the physical, physiological, genetic, intellectual, economic, cultural or social identity of the natural person identifiable;
30. **natural person:** human (homo sapiens);
31. **protest:** a statement by the data subject that he objects to the processing of his personal data and requests the termination of the data processing or the deletion of the processed data;
32. **legal representative:** chairman of the Association.
33. **client:** any natural person, legal entity or organization without legal personality with whom the Association establishes a contractual relationship;

Chapter IV: Principles governing the processing of personal data

1. Personal Information:

- (a) it must be administered in a manner which is lawful and fair and transparent to the data subject ('legality, due process and transparency');
- (b) they are collected for specified, explicit and legitimate purposes and not managed in a way incompatible with those purposes; further processing of data for archiving purposes in the public interest, for scientific and historical research or for statistical purposes ("purpose limitation") shall not be considered incompatible with the original purpose, in accordance with Article 89 (1);
- (c) they must be appropriate and relevant to the purposes for which the data are processed and must be limited to what is necessary ('data-saving');
- (d) be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data which are inaccurate for the purposes of the processing are immediately deleted or rectified ('accuracy');
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for a longer period only if they are processed for archiving purposes in the public interest, for scientific and historical research or for statistical purposes in accordance with Article 89 (1) of the Regulation; and subject to the implementation of appropriate technical and organizational measures to protect its freedoms ("limited storage"); (f) processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, through the use of appropriate technical or organizational measures ("integrity and confidentiality").

2. The controller shall be responsible for and must be able to justify such compliance ("accountability").

3. The Association shall only handle personal data originating from the data subject, and the data subject has given his or her consent to the processing of the personal data provided by him / her for a specific purpose.

4. The Association does not solicit, accept or process the personal data of the data subject.

5. The Association does not make any decision based on automated data management that would have legal effect on the data subject. The Association does not perform profiling based on the personal data it manages.

Chapter V: Purpose, legal basis of data management, scope of data processed

1. The data management performed by the Association is primarily related to the fulfillment of the purpose defined by the Association and accomplished by its members. Personal information provided by the client, member and volunteer will be processed by the Association for the purpose of conducting the activities of the Association (purpose-specific).
2. In the course of its activities, the Association handles only personal data voluntarily provided by clients, members and volunteers, or otherwise public information. The client, member and volunteer are responsible for the accuracy and veracity of the personal information they provide to the Association.
3. In order to carry out the activities of the Association, the Association manages the following personal data:

in the case of a natural person:

the given name (surname, first name, forenames);
email address,
phone,
residence,
mother's birth name,
place and date of birth,
identity number,

for legal persons and for organizations without legal personality:

name;
office;
company registration number / registration number;
tax identification number;
email address;
telephone number;
the name and address of the legal representative;

4. In carrying out the activities of the Association, the Association shall provide the Preliminary Information to the client, the member and the volunteer on paper or electronically.

The full text of the Preliminary Information is contained in Appendix 1 to the Policy. of the Annex. The Client, the Member and the volunteer must become aware of and accept the Prior Disclosure prior to providing any personal information.

5. In the Preliminary Information the Association informs the data subject that the data management is based on the voluntary consent of the data subject. Prior to the commencement of data processing, the Association shall inform the data subject in a clear and detailed manner prior to the commencement of data processing, in particular the purpose and legal basis of the data processing, the person authorized to process and process the data, who has access to it, will keep a record based on personal information. The Association also draws attention to the data subject's rights and remedies in the Prior Information Notice.

6. Rights of the data subject regarding data management

shall have the right to receive feedback from the controller that the processing of the personal data is ongoing and, if so, that the data subject shall have access to the personal data and information specified in Article 15 (1) of the Regulation;
the right to rectification;
the right to erasure;
the right to restrict data management;
the right to data portability;
the right to protest;
the right to a remedy.

7. Upon request, the data subject shall be informed of the data processed, the source, the purpose, legal basis, duration of the data processing, the circumstances, the effects of the data protection incident and the measures taken to rectify it, and the legal basis for the transfer. recipient of.

8. At the request of the data subject, such information shall be given in writing, within a minimum period which shall not exceed 30 days from the date of submission of the request, and in a clear format.

9. The information shall be free of charge if the customer has not submitted a request for information to the Association in respect of the same data set in the current year. In other cases, the client, the member and the volunteer are obliged to pay HUF 10,000 per occasion to the Association. The information may only be denied in the cases specified in the Regulation or in the Info Act. In the event of a refusal to provide information, the reason for the refusal shall be stated by reference to a specific legal provision, and the possibility of judicial redress and recourse to the Supervisory Authority shall be provided.

10. Personal data must be deleted within 72 hours of receipt of the request for deletion / decision if:

- A. its management is unlawful;
- B. the person concerned requests;
- C. incomplete or erroneous - which cannot be legally remedied - unless cancellation is excluded by law;
- D. the purpose of data management has ceased to exist or the statutory time limit for the storage of data has expired;
- E. it has been ordered by a court or the Supervisory Authority.

11. Personal data shall be blocked instead of being erased if the data subject so requests or if the information available to him / her indicates that the deletion would harm the data subject's legitimate interests. The personal data so locked up may only be processed for as long as the purpose of the data processing, which precludes the deletion of the personal data, is fulfilled.

12. If the Association is obliged to provide information, communicate, transmit or provide documents upon request of a court, prosecutor, investigative authority, administrative authority, data protection commissioner or upon request of other authorities, the Association shall specify the exact information specified by the requesting authority. For the purpose of the request and for the scope of the data, it shall disclose personal data only to the extent and to the extent strictly necessary for the purpose of the request.

13. The privacy incident shall be reported to the Supervisory Authority by the Association without undue delay and, if possible, within 72 hours of becoming aware of the privacy incident, unless the privacy incident is likely to endanger the rights and freedoms of individuals. If the notification is not made within 72 hours, the reasons for the delay shall be included. The notification of a data protection incident shall contain at least the provisions of Article 33 (3) of the Regulation. If the data protection incident is likely to pose a high risk to the rights and freedoms of natural persons, the Association shall without undue delay inform the data subject of the data protection incident.

14. The Association carries out data management on electronic documents or paper documents stored on the computer (s) of its headquarters. The Association provides electronic data protection on its computer (s) through passwords, firewalls and other IT security tools, while storing and preserving paper-based documents in a secured place.

15. The Association maintains a system of record keeping of personal data and other information made available by clients, members and volunteers. The registration system is the exclusive property of the Association. By accepting the Prior Disclosure, the Client, the Member and the Volunteer acknowledge that the Association constitutes a filing system of personal data and other information.

16. The client, member and volunteer must notify the Association in writing of any change in their personal data within five business days of the change.

17. The data subject shall send the request for cancellation (deletion of data) in writing to the Association's electronic mail address electronically.

18. The Association does not employ a data processor in its data management except the case of hiking events run under the domain of Budapest Hikers. In case of online ticket reservation (participation fee) for these sport events, personal data is stored and transferred to OTP Mobil Kft. (1093 Budapest, Közraktár u. 30-32.) as data processor. The following data is transferred: name, company name, email address, phone number, address.

19. The Association does not transfer personal data to third countries or international organizations.

20. The Association does not disclose personal information to third parties.

21. The Association is a non-governmental (civil) organization, in accordance with CLXXXV of 2011 on the right of association, the legal status of public benefit and the operation and support of non-governmental organizations. law. 2. § 6. b).

Chapter VI: Force majeure

1. Force majeure events such as war, sabotage, bombing, emergency, elemental (flood, fire, lightning, other natural disaster), severe power failure, hacker attack, your server, the consequences of 24-hour server downtime, work stoppages, emergency measures taken by authorized organizations under the Defense Law and the Police Act, and changes in legislation that significantly hinder or render data processing impossible for the Association, provided this circumstance It is created after it has been made available to the Association, or it is created prior to the provision of personal data, but the consequences affecting the data management were not foreseen at that time k.

2. Force majeure shall exempt the Association from fulfilling its data management obligations to the extent that the force majeure event prevents the Association from complying with its data management obligations. The discharge shall be limited to the period during which the event in question lasts.

3. The Association shall notify the Clients, members and volunteers affected by a Force Majeure notification within 72 hours of the force majeure event. The Association shall indicate in the information sent to the Client, the member and the volunteer within the same time period the beginning, nature and, if possible, the expected end of the force majeure event. In connection with the elimination of the consequences, the parties are bound by Act V of 2013. (Civil Code), acting reasonably and reasonably in cooperation with one another.

4. Force majeure shall not, in itself, relieve the Association of any obligations it may have otherwise incurred under the contract with the Client, a member or volunteer that were due or due to force majeure prior to the occurrence of the force majeure event.

5. In the event of force majeure, the parties shall make every effort to minimize the damage caused by the circumstances.

Chapter VII: Remedies

1. The data subject may apply for legal remedies if he / she considers that the Association has violated the data management rules set out in the Decree XXXVIII of 2018 (Infotv).

The means of redress available to the data subject are:

have the right to object to the processing of your personal data at the Association;

have the right to lodge a complaint with the Supervisory Authority;

shall have the right to apply to a civil court in order to seek compensation.

2. The person concerned may submit his protest to the Association in writing. The Association shall investigate the objection within the shortest time, but not more than 30 days from the date of submission of the application. Based on the investigation, the Association is obliged to make a decision as to whether it agrees with the objections and the person concerned must be informed of its decision in writing.

3. If the objection of the data subject is substantiated, the data processing shall be terminated and personal data shall be blocked, and the person to whom the personal data subject to the objection have previously been transmitted and shall be informed of the objection and the measures taken pursuant thereto order.

4. In the event of a violation of his or her rights, the person concerned may apply to a civil court if he considers that he has suffered material or non-material damage as a result of the violation of the Regulation. The person concerned shall bring an action for damages before the courts of the Member State in which the Association operates. Legal proceedings may also be instituted before the courts of the Member State in which the person concerned is domiciled.

5. The complaint concerned will be referred to the Supervisory Authority if, in its opinion, there is an infringement or imminent threat of a breach of the law governing the processing of your personal data, unless a legal action is pending in that case. The Supervisory Authority may, upon notification, conduct an investigation or initiate legal proceedings.

Chapter VIII Final provisions

1. The Board of the Association is responsible for the preparation and amendment of the present Policy.

2. The Association reserves the right to amend the Policy. The Association shall prepare a consolidated version of the Policy.

3. The Association is responsible for ensuring that the Policy is in constant compliance with the Regulation and the Decree XXXVIII of 2018 (Infotv) applicable provisions.

4. The Association is not obliged to submit its Policy to the Supervisory Authority.

5. The Policy is the property of the Association. The text or part of the Policy may be reproduced, copied or used only with the prior written permission of the Association.

Disclaimer: The above Policy was approved by the members of the association 19.03.2018.

Budapest,



Budapest Association for International Sports
Bence Garamvölgyi
President

*Annex I.
Preliminary Information*

Basic information of the Association (Data Controller): Budapest Association for International Sports (Legal Seat: 1094 Budapest, Ferenc tér 2-3. VII / 2, Registered by the Metropolitan Court of Budapest, Registration number: 01-02-0016742, Tax number: 18946426-1-43, Statistical number: 18946426-8551-529-01, Email: wemovebudapest@gmail.com, Legal Representative: Bence Garamvölgyi, President)

Data management is based on the voluntary consent of the data subject.

The Association does not have a data protection officer.

The data management performed by the Association is primarily related to the fulfillment of the purpose defined by the Association and accomplished by its members. Personal information provided by the client, member and volunteer will be processed by the Association for the purpose of conducting the activities of the Association (purpose-specific).

The data management is carried out by the Association, its members and employees.

The Association will not disclose personal information to third parties.

The Association does not employ a data processor in its data management except the case of hiking events run under the domain of Budapest Hikers. In case of online ticket reservation (participation fee) for these sport events, personal data is stored and transferred to OTP Mobil Kft. (1093 Budapest, Közraktár u. 30-32.) as data processor. The following data is transferred: name, company name, email address, phone number, address.

The Association does not transfer personal data to any third country or international organization.

The Association maintains a system of records based on the personal data it manages.

The data subject shall have the right to request the Association to access, rectify, delete or limit the processing of personal data concerning him or her and may object to the processing of such personal data and to the data subject's right to data portability.

Rights of the data subject regarding data management

shall have the right to receive feedback from the controller that the processing of the personal data is ongoing and, if so, that the data subject shall have access to the personal data and information specified in Article 15 (1) of the Regulation;

the right to rectification;

the right to erasure;

the right to restrict data management;

the right to data portability;

the right to protest;

the right to a remedy.

The data subject shall have the right to withdraw the right to data processing at any time, without prejudice to the lawfulness of the data processing carried out on the basis of his / her consent before the withdrawal.

The data subject may apply for legal remedies if he / she considers that the Association has violated the data management rules set out in the Decree, the Infotv.

The means of redress available to the data subject are:

have the right to object to the processing of your personal data at the Association;

have the right to lodge a complaint with the Supervisory Authority;

shall have the right to apply to a civil court in order to seek compensation.

The provision of personal data is a prerequisite for the establishment of a legal relationship. If the personal data of the data subject are not provided, the Association shall establish a legal relationship with the data subject.

The Association does not make any decision based on automated data management that would have legal effect on the data subject. The Association does not perform profiling based on the personal data it manages.