



**DATA MANAGEMENT  
AND  
PROTECTION  
POLICY**

**D A G E N E**

Dunamenti Állatfajták Génmegőrző  
Nemzetközi Egyesülete

## **1. INTRODUCTION**

The purpose of the current Data Management and Protection Policy is to comply with the General Data Privacy Regulation (hereinafter referred to as GDPR) of the “European Parliament and Council (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of such data [...]” and the Hungarian “Act CXII. of 2011. on the Right of Informational Self - Determination and on Freedom of Information”. The Policy therefore complies with data protection measures and procedures for the personal data processing by the DAGENE – International Association for the Conservation of Animal Breeds in the Danube Region, 1078 Budapest, István utca 2.(hereinafter: DAGENE Association or Association).

### **Legal commitment**

The DAGENE Association, as a data controller:

- agrees to be bound by the content of this legal notice;
- commits itself to comply with the current policy requirements and applicable laws regarding its data management activities;
- reserves the right to change this information, provided that data subjects are notified in due time;
- is committed to the personal data protection of its data subjects (partners, clients and members) and to the utmost importance of their right to informational self-determination;
- processes personal information with confidentiality and will take security measures - administrative, physical and logical - to guarantee data security.

### **Legal environment and regulatory framework**

The DAGENE Association describes its data management principles and requirements it has formulated and intends to comply with as a data controller.

The data management principles are in line with current legislation in force, in particular:

- Act C. of 2000. on Accounting;
- Act CVIII of 2001 on certain issues of electronic commerce activities and information society services
- Act CLXXV. of 2011., on the Right of Association, Non-profit Status, and the Operation and Funding of Civil Organisations;
- Act CXII. of 2011. on the Right of Informational Self - Determination and on Freedom of Information;
- Act LXVI of 1995 on Public Records, Public Archives, and the Protection of Private Archives
- Act I. of 2012. on the Labour Code;
- Act V. of 2013. on the Civil Code;
- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);

### **Material and personal scope of the Policy**

The material scope of the Policy applies to all data processing and management activities by the Association – involving personal data - being it by manual, computerized or automated means.

The personal scope of the Policy extends to contractual relationships – as stipulated in the contract or on the basis of the confidentiality statement / non-disclosure agreement – and/or to natural-, legal persons, non-legal entities (hereinafter referred to as the "External person") who come in contact with the information system(s) and services of the Association.

Current Policy takes into account - in particular, but not limited to - the Statutes of the Association and the Organizational Rules.

Issues not addressed by this Policy shall be governed by the provisions of the Information Act of 2011. (Act CXII. of 2011), the Hungarian Civil Code and the EUs General Data Protection Regulation, as well as the other applicable legal provisions in force.

## **2. DEFINITIONS**

- **data subject** shall mean any natural person directly or indirectly identifiable by reference to specific personal data;
- **personal data** shall mean data relating to the data subject, in particular by reference to the name and identification number of the data subject or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity as well as conclusions drawn from the data in regard to the data subject;
- **special data** shall mean: a) personal data revealing racial origin or nationality, political opinions and any affiliation with political parties, religious or philosophical beliefs or trade-union membership, and personal data concerning sex life; b) personal data concerning health, pathological addictions, or criminal record;
- **criminal personal data** shall mean personal data relating to the data subject or that pertain to any prior criminal offense committed by the data subject and that is obtained by organizations authorized to conduct criminal proceedings or investigations or by penal institutions during or prior to criminal proceedings in connection with a crime or criminal proceedings;
- **data of public interest** shall mean information or data other than personal data, registered in any mode or form, controlled by the body or individual performing state or local government responsibilities, as well as other public tasks defined by legislation, concerning their activities or generated in the course of performing their public tasks, irrespective of the method or format in which it is recorded, its single or collective nature; in particular data concerning the scope of authority, competence, organisational structure, professional activities and the evaluation of such activities covering various aspects thereof, the type of data held and the regulations governing operations, as well as data concerning financial management and concluded contracts;
- **data public on grounds of public interest** shall mean any data, other than public information, that are prescribed by law to be published, made available or otherwise disclosed for the benefit of the general public;
- **consent** shall mean any freely and expressly given specific and informed indication of the will of the data subject by which he signifies his agreement to personal data relating to him being processed fully or to the extent of specific operations;

- **objection** shall mean a declaration made by the data subject objecting to the processing of his/her personal data and requesting the termination of data processing, as well as the deletion of the data processed;
- **controller** shall mean natural or legal person, or organisation without legal personality which alone or jointly with others determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or have it executed by a data processor;
- **data processing** shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans);
- **data transfer** shall mean ensuring access to the data for a third party;
- **disclosure** shall mean ensuring open access to the data;
- **data deletion** shall mean making data unrecognisable in a way that it can never again be restored;
- **tagging data** shall mean marking data with a special ID tag to differentiate it;
- **blocking of data** shall mean marking data with a special ID tag to indefinitely or definitely restrict its further processing;
- **data destruction** shall mean complete physical destruction of the data carrier recording the data;
- **data processing** shall mean performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data;
- **data processor** shall mean any natural or legal person or organisation without legal personality processing the data on the grounds of a contract, including contracts concluded pursuant to legislative provisions;
- **data source** shall mean the body responsible for undertaking the public responsibility which generated the data of public interest that must be disclosed through electronic means, or during the course of operation in which this data was generated;
- **data disseminator** shall mean the body responsible for undertaking the public responsibility which uploads the data sent by the data source it has not published the data;
- **data set** shall mean all data processed in a single file;
- **third party** any natural or legal person, or organisation without legal personality other than the data subject, the data controller or the data processor;
- **EEA Member State** any Member State of the European Union and any State which is party to the Agreement on the European Economic Area, as well as any State the nationals of which enjoy the same legal status as nationals of States which are parties to the Agreement on the European Economic Area, based on an international treaty concluded between the European Union and its Member States and a State which is not party to the Agreement on the European Economic Area;
- **third country** any State that is not an EEA State;
- **binding corporate rules** shall mean internal data protection rules adopted by a data controller or a group of data controllers operating in multiple countries, at least in one EEA Member State, and approved by the National Authority for Data Protection and Freedom of Information (hereinafter referred to as Authority) binding upon the data

controller or group of data controllers that, in case of a data transfer to third countries, ensures the protection of these data by unilateral commitment of the respective controller or group of controllers;

- **data incident** shall mean the unlawful processing or process of personal data, in particular the illegitimate access, alteration, transfer, disclosure, deletion or destruction as well as the accidental destruction or damage.

### **3. ORGANIZATIONAL DATA**

DAGENE Association data and contact information:

Name: DAGENE - Dunamenti Állatfajták Génmegőrző Nemzetközi Egyesülete

Legal headquarters: Székhely: 1078 Budapest, István utca 2.

Tax No.: 18094165-1-42

Registration No.: 01-02-0008361

Tel.: +36 20 478 4437

Email: [info@dagene.eu](mailto:info@dagene.eu)

Data processor representative: Dr. Gáspárdy András

### **4. SETS OF PERSONAL DATA - PURPOSE, SUBJECT AND DURATION OF DATA MANAGEMENT**

The aim of the Association is to protect the genetic resources of endangered indigenous animal species living in the broader circle of Danubian countries. Organizing joint research, scientific programs, collecting and exchanging information about indigenous and endangered varieties.

Also finding, locating and preserving specimens of the mentioned species and varieties in the Danubian countries by exchanging and breeding them.

Tasks and activities:

- To promote the work of members and advocacy, ensuring the equality of members
- Organization of joint programs;
- Joint research, organization of scientific research and projects, exchange of breeding animals and organization of exhibitions
- Professional training and further training;
- Collaboration, cooperation with other gene conservation organizations;
- Participation in international organizations for indigenous and protected varieties and integrations; such as the United Nations Food and Agriculture Organization (FAO), the European Livestock Farmers Association (EAAP), the European Organic Animal Organic Co-ordinators (ERFP);
- Incentivizing the publication of information material and the implementation of such publications within the organization.

To accomplish its goals and to carry out its activities and tasks, it performs the following purpose limited data management:

#### **1. Official website**

The official website of the Association is [www.dagene.eu](http://www.dagene.eu).

Visitors can visit our website without the need to provide personal information as personal information is not required to view the information on the website.

The cookies used by this site only record information that is not personally identifiable. Browsers do not share their own cookies between domains. If you want to manage cookies or disable cookies, you can do this from your own computer in your browser.

Our website also contains links to other websites or content. The Association does not assume responsibility for the contents of these websites, the information contained therein, the software or products displayed, services or the consequences of their use, or their data protection and data management policy.

Only external service providers can provide detailed information about their data protection and data management policy.

Access to any other website associated with this website is subject to the sole responsibility of the user.

The domain and hosting service provider - MAXER Ltd. – performs statistics measurements regarding our website traffic.

## **2. Invoice issuance and receipt**

### Purpose of processing:

- Issuance of invoice for the customer, compliance with legal requirements; During billing, DAGENE will issue a paper invoice to the customer. Receiving an invoice from the issuer, compliance with legal requirements; DAGENE will receive and accept paper and electronic invoices.

### Legal basis for data management:

- GDPR article 6., paragraph (1), point b) - necessary for the performance of a contract
- GDPR article 6., paragraph (1), point c) - necessary for compliance with a legal obligation – Act C. of 2000. on Accounting, 166. § (1)

### Scope of personal data:

- Buyers name on invoice
- Buyers address
- Sellers name on invoice
- Sellers address
- TAX ID
- Bank account number
- Contact information (e-mail and telephone number)

Data retention period: According to 169. § (2) of Act C. of 2000. on Accounting – 8 years.

Possible consequences of unperformed data collection: The provision of data is subject to the conclusion of the contract.

Recipients of personal data: Recipients of personal data: The data processed by the data controller shall not be disclosed to third parties except the data processor (s) indicated in points 5 and 7. Recorded data can only be accessed by the data controllers employees and by the dedicated staff of the data processor (s).

Data subjects affected by data processing: Data subjects for whom an invoice is issued or data subjects from whom an invoice is accepted by the data controller.

Registry: Accountancy

### 3. Scientific and/or information events

DAGENE organizes scientific conferences, information events and study trips to achieve its goals and communicate the results of its members and research partners.

Purpose of processing: dissemination of research information

Legal basis for data management:

a) According to article 6. (1) a) of GDPR processing is based on the data subjects prior and voluntary consent;

Scope of personal data:

- Name
- Photograph
- Address
- Contact information (e-mail and telephone number)

Data retention period:

- In case of a) until the withdrawal of prior voluntary data processing consent, but not longer than 2 years;
- According to Government Regulation 272/2014. (XI.5.) on the use of EU funds in the 2014-2020 period in Hungary covers authorities and procedures 71. § (8) a) and (9): until the 31st of December 2017.

Possible consequences of unperformed data collection: In case of a) information and services can't fully be provided by/during the event; In case of b) sanctions by Government Regulation 272/2014. (XI.5.).

Recipients of personal data: The data processed by the data controller shall not be disclosed to third parties except the data processor (s) indicated in points 5 and 7. Recorded data can only be accessed by the data controllers employees and by the dedicated staff of the data processor (s).

Data subjects affected by data processing: Data subjects attending the information event.

Registry: Paper-based attendance sheets

### 4. Employment

To pursue its goals the Association establishes and maintains employment relationships. Employment rights are exercised by the President of the Association.

Purpose of processing: employment

Legal basis for data management:

- According to article 6. (1) c) of GDPR processing is necessary for compliance with a legal obligation - according to the Act LXVI of 1995. Public Records,

Scope of personal data:

- Name
- Place and date of birth
- Mothers maiden name
- Residential address

- Social Security Number
- TAX ID
- Bank account number
- Highest education
- Motor vehicle information
- Contact information (e-mail and telephone number)

Data retention period: According to the Act LXVI of 1995. Public Records, records of permanent value must be retained until transferred to the Public Archives.

Possible consequences of unperformed data collection: The provision of data is subject to the conclusion of the contract.

Recipients of personal data: The data processed by the data controller shall not be disclosed to third parties except the data processor (s) indicated in points 5 and 7. Recorded data can only be accessed by the data controllers employees and by the dedicated staff of the data processor (s).

Data subjects affected by data processing: Lawful employees of the Association.

Registry: Employment records/documents such as employment contracts, certificates, time- sheets, tax declarations, declaration forms, payslips and payroll summaries.

## 5. Bodies and members of the Association

Registration of Association membership in accordance with the Act of 2011 on Civil Associations and the Civil Code of 2013;

Bodies of Association:

- General Assembly,
- Presidium,
- Supervisory Board,

Data processing is done through documents and records related to the legal form of the association, organization and membership.

Purpose of processing: Registration of Association membership in accordance with the Act of 2011 on Civil Associations and the Civil Code of 2013;

Legal basis for data management:

- According to article 6. (1) c) of GDPR processing is necessary for compliance with a legal obligation – 3:68.§-3:70.§ of Act V. of 2013. of the Civil Code regarding the definition, the establishing and the membership of an association;

Scope of personal data:

- Name
- Address
- Place and date of birth
- Mothers maiden name
- Residential address
- Contact information (e-mail and telephone number)

Data retention period:

According to 3:68.§-3:70.§ of Act V. of 2013. on the Civil Code, until the termination of membership;

Possible consequences of unperformed data collection: the purpose of data processing is based on statutory obligations, therefore, without the provision of personal data, no membership relationship can be created or maintained.

Recipients of personal data: The data processed by the data controller shall not be disclosed to third parties except the data processor (s) indicated in points 5 and 7.



Recorded data can only be accessed by the data controllers employees and by the dedicated staff of the data processor (s).

Data subjects affected by data processing: Members of the Association, members of association bodies.

Registry: Statutory Register of Members, Membership Applications, Attendance sheets, minutes of meetings and notes, declarations of acceptance, authorizations.

## **6. Contracts and agreements**

Purpose of processing: Provision of services necessary for organizational operation and performance of tasks

Legal basis for data management:

- According to article 6. (1) b) of GDPR processing is necessary for the performance of a contract;
- According to article 6. (1) c) of GDPR processing is necessary for compliance with a legal obligation - Act C. of 2000. on Accounting 166. § (1);

Scope of personal data:

- Name
- Address
- Mailing address
- TAX ID
- Bank account number
- Contact information (e-mail and telephone number)

Data retention period: According to 169. § (2) of Act C. of 2000. on Accounting – 8 years.

Possible consequences of unperformed data collection: The provision of data is subject to the conclusion of the contract.

Recipients of personal data: Recipients of personal data: The data processed by the data controller shall not be disclosed to third parties except the data processor (s) indicated in points 5 and 7. Recorded data can only be accessed by the data controllers employees and by the dedicated staff of the data processor (s).

Data subjects affected by data processing: Data subjects with whom the Association enters into a contract.

Registry: Accountancy

The Association does not process special data.

## **5. DATA TRANSFER AND DATA TRANSMISSION**

Data transfer is a data processing operation in which the Association as a data controller or data processor, according to the appropriate legal basis, transmits personal data to external private or legal persons, supervisory body, in a specific manner and through a medium, on a regular basis, to a data controller (hereinafter data receiver).

Authorities, public bodies, courts may contact the Association for the purpose of requesting communication of personal data. Our association transfers personal data to these bodies - provided that the body concerned indicates the exact purpose and scope of the data - only to the extent that it is indispensable to achieve the purpose of the request and only if compliance is required by law.

Data transfer requests from other bodies, organizations or individuals may only be made if the person concerned provides the requestor with a notarized written authorization or a private

document with full evidentiary force. The data subject may grant such an authorization in advance, which may apply for a specific time period and for a specific range of people seeking information.

Data transmission and transfer is recorded in the data transfer record (electronic table).

## **6. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS**

The Association does not transmit the processed personal data to any third country or other international organization.

## **7. REQUISITION OF INFORMATION ABOUT DATA PROCESSOR**

When using an external data processor, the rights and obligations of the data processor regarding the processing of personal data are determined by the Association as data controller within the framework of the Information Act.

The Association is fully responsible for the legality of instructions issued.

Agreements on data processing shall be made in writing. Organizations which have direct business interest in the usage of the processed personal data cannot be entrusted with data processing. The selected data processor may not use another data processor when performing his activities.

Scope of data processors: businesses providing accounting services

## **8. DATA PROTECTION INCIDENT MANAGEMENT**

Our organization takes all necessary technical and organizational measures to avoid data protection incidents.

In an event of an incident we record the immediate measures and inform all parties concerned, including the data subject(s), people directly involved in the data protection

In an event of an incident we record data for the purpose of auditing and informing concerned data subject. These records contain: scope of affected personal data, scope and number of data subjects involved, the date, circumstances, effects, protective measures and data according sectorial data management provisions and regulations.

72 hours

The NAIH will be notified within 72 hours according to the law.

## **9. RIGHTS OF DATA SUBJECT**

Data subject has the right:

- a) to request access to personal data,
- b) to request rectification of personal data,
- c) to request rectification erasure of personal data,
- d) to request restriction of processing concerning the data subject according to Article 18. of GDPR (meaning, that our organization wont erase or discard the data until contacted by court or authority and in addition, wont process the data for other purposes).
- e) object to processing to processing of his/hers personal data
- f) the right to data portability. The person is entitled to receive the personal data relating to him in Word or Excel format and is entitled to request the transfer of this information to another processor by our Association.

## **10. METHODS FOR STORING PERSONAL DATA, SECURITY OF DATA MANAGEMENT**

The technical (physical, logical) and organizational solutions for data protection are detailed within the information security regulations. Our organization's information systems and data retention solutions are located at the premises of our headquarters and in our data processing systems. Our association – in accordance with its information security rules - selects and manages its IT tools for personal data management, so that the processed data is:

- a) accessible to the authorized personal (availability),
- b) credibility and authentication (credibility of data management),
- c) verifiable integrity (data integrity),
- d) protected against unauthorized access (data confidentiality).

The data is protected by appropriate measures, particularly against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against unavailability due to accidental damage or technical changes.

The IT system and network of our Association is protected against computer-aided fraud, viruses, intrusion and denial of service attacks.

The Association will take every possible measure to avoid data protection incidents. In the event of such an incident we will immediately take steps to minimize the risks and to prevent damage.

Incidents are recorded in the incident log.

## **11. RIGHTS OF DATA SUBJECTS, LEGAL REMEDIES**

The data subject may request information concerning the management of his/hers personal data and may request the rectification of data or - with the exception of mandatory data processing – the erasure of data, the revocation of data processing consent; exercise the right to portability and protest to processing at the indicated point of data recording or at the contact point provided.

At the request of the data subject, we provide the information in electronic format without delay, but at the latest within 15 days.

If the transfer of information to the data subject cannot be accomplished within 15 days, we will notify the data subject within 15 days of the request, and within 1 month of the notification, the information requested by the data subject will be communicated.

Request regarding legal rights of the data subjects below are fulfilled free of charge.

### **Right to information:**

Our association shall take appropriate measures to ensure that all information on personal data processing, referred to in Articles 13-14. of the GDPR, and according to Article 15-22. and 34. in a concise, transparent, comprehensible and easily accessible form, in a clear and straightforward, but precise manner.

The right to information can be exercised in writing through the contact details given in point 3. At the request of the data subject - after verifying his/her identity - information may be given verbally. We inform our clients that if our associates have any doubt about the identity of the data subject, we may request information to confirm the subject's identity.

### Right to access:

The data subject has the right to be informed by the data controller about whether his personal data is being processed. If personal data processing is in progress, the data subjects has the right to have access to it and the information listed below.

- Purpose of data processing;
- Scope of personal data;
- the categories of recipients or recipients with whom personal data will be communicated or disclosed, including in particular third country (non-EU) recipients or international organizations;
- planned personal data retention period;
- right to rectification, deletion or restriction and objection to data processing;
- right to lodge a complaint to the Supervisory Authority;
- Information concerning the data source; the fact of automated decision making, including profiling, as well as the logic used and the comprehensible information on the significance of such data management and the likely consequences for the data subject.

In addition to the above, in case of transferring personal data to a third country or to an international organization, the data subject is entitled to receive information about the appropriate guarantees.

### Right to rectification:

Anyone has the right to request the rectification of their inaccurate personal data processed by the Association and also to request its completion if incomplete.

### Right to be forgotten / Right to erasure:

The data subject has the right, on any of the following grounds, to request the deletion of his/her personal data without undue delay if:

- a) personal data are no longer required for the purpose from which they have been collected or otherwise processed;
- b) the data subject withdraws the consent for processing and the data controller does not have any other legal basis for data processing;
- c) the data subject is objecting to the data processing and there is no legitimate reason with higher legal priority for data processing;
- d) the unlawful processing of personal data can be established;
- e) the personal data are to be deleted in order to comply with the legal obligation imposed upon the data controller by Union or Member State law;
- f) the collection of personal data is in connection with the provision of information society services.

Data deletion can not be initiated if data processing is required for any of the following purposes:

- a) to exercise the right to freedom of expression and the right to information;
- b) the fulfillment of a legal obligation under EU or State law applicable to the data controller, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

- c) for public health or archaeological, scientific and historical research, statistical purposes in the public interest;
- d) for the submission, validation or protection of legal claims.

Right to restriction of data processing:

Upon the request of the data subject we restrict data processing according to existing conditions under Article 18. of the GDPR, therefore if:

- a) the data subject disputes the accuracy of the personal data; in this case, the restriction concerns the period of time which allows the accuracy of the personal data to be verified;
- b) the data processing is unlawful and the data subject is opposed to the deletion, instead requests the processing be restricted;
- c) the data controller no longer in need of the personal data for processing, but the data subject requires them to submit, enforce or protect legal claims; or
- d) the data subject objected to the data processing; in this case, the restriction applies to the duration of determining whether the data controller's legitimate reasons prevail over the legitimate grounds of the data subject.

If data processing is restricted – with exception of storage - personal data may only be processed with the consent of the person concerned or with the purpose of protecting the submission and enforcement of legal claims or other rights of a natural or legal person, or in the public interest of the European Union or of a Member State, except for storage.

Right to data portability:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. Our organization can comply with such requests by providing the data in Word or Excel format.

Right to object:

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her. Where the data subject objects to processing based on legitimate grounds the personal data shall no longer be processed for such purposes.

Right to withdraw consent:

The data subject concerned has the right to withdraw his consent at any time. The withdrawal of consent does not affect the lawfulness of the consent to data processing, prior to the withdrawal.

Procedural rules:

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

the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

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

The data controller informs all concerned recipients of any data rectification, deletion or limitation unless it proves impossible or requires disproportionate effort. The data subject is informed the recipients as requested.

Right to compensation and liability:

Any person who has suffered material or non-material damage as a result of a violation of the Data Protection Regulation is entitled to compensation for the damage sustained by the data controller or the data processor. The data processor shall only be held liable for damages caused by data processing if he/she has not complied with the statutory obligations specifically imposed on the data processor or if the data controller's legitimate instructions have been disregarded or contravened. If several data controllers or multiple data processors or both the data controller and the data processor are involved in the same data management and are responsible for the damage caused by the data processing, each data controller or data processor is jointly and severally liable for the total damage. The data controller or data processor shall be exempt from liability if he/she proves that he or she is not responsible in any way for the event(s) giving rise to the damage.

Right to court and Data Protection Authority procedure:

The data subject may turn to the court in case his/her rights have been breached. The court will proceed within an emergency motion.

**Complaints can be lodged with the National Authority for Data Protection and Freedom of Information:**

Nemzeti Adatvédelmi és Információszabadság Hatóság  
1125 Budapest, Szilágyi Erzsébet fasor 22/C  
Mail: 1530 Budapest, Pf.: 5.  
Tel.: +36-1-391.1400  
E-mail [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Budapest 2018.05.25.

Dr. Gáspárdy András  
president