

# DATA PROTECTION AND PRIVACY NOTICE

## (DATA MANAGEMENT RELATED TO SOCIAL NETWORKING SITES)

## I. PRESENTATION OF THE CONTROLLER

The **Sportmarketing Agency Ltd.** (hereinafter referred to as **the "Controller"** or the **"Event Organizer"**) attaches great importance to respecting the right of informational self-determination of visitors to its social networking sites related to the HARLEY-DAVIDSON® 120th ANNUAL EVENT (hereinafter referred to as the **"Event"** or **"hd120Budapest"**). The Controller shall treat personal data confidentially, in accordance with the applicable European Union and national legislation and relevant data protection (authority) practices, and shall take all security and organizational measures to ensure the security, confidentiality, integrity and availability of the data.

The Controller is subject to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter "**GDPR**") and the 2011 Regulation on the right to information and freedom of information. CXII of 2011 (hereinafter referred to as the "**Information Act**"), the following information notice (hereinafter referred to as the "**Notice**") is published in order to protect the personal data of visitors to this website.

The Notice is effective from **12.05.2023** until revoked with regard to the processing of personal data of data subjects by **the Controller in the course of the operation of the website**.

The Controller reserves the right to unilaterally change this Policy at any time. In the event of any modification of this Notice, the Controller shall inform the data subjects thereof.

Controller's data:	
company name:	Sportmarketing Agency Ltd.
company registration number:	01-09-287952
is based in:	1065 Budapest, Podmaniczky utca 12. fszt. 3.
postacíme:	1065 Budapest, Podmaniczky utca 12. fszt. 3.
your electronic address:	info@dakar.hu
website address:	http://sportugynokseg.hu/
representative:	Balázs Árpád Szalay Managing Director
data protection relationship:	gdpr@sportugynokseg.hu

The Controller processes personal data in accordance with all applicable laws, but in particular with the following:

- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter referred to as "the Infoty.");
- 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 (General Data Protection Regulation; hereinafter "the Regulation" or "GDPR").

The Controller shall treat personal data confidentially, and shall take all technical and organisational measures related to data storage and management, and other technical and organisational measures to ensure the security of the data.

# Definitions

The terminology of this Information Notice is identical to the interpretative definitions set out in Article 4 of the Regulation, and in certain points supplemented by the interpretative provisions of Article 3 of the Infotv. The definitions relevant for the interpretation of this Information Notice are set out in Annex 1.

When this Notice refers to data or data processing, it means personal data or the processing thereof.

# II. PURPOSES OF DATA PROCESSING

THE PROCESSING OF PERSONAL DATA OF VISITORS TO SOCIAL NETWORKING SITES CREATED BY THE CONTROLLER

### 2.1. Data processing on social networking sites in general

In today's online world, the most important platforms for communication are social networking sites. The Controller intends to provide up-to-date information about the Event it is organising and about the Event itself, in addition to its website, through its social networking sites. These sites will allow for more direct contact with interested parties and will also allow the information published by the Controller to reach a wider audience of readers and viewers.

The Controller currently uses the following sites:

- Facebook page (hereinafter "Facebook Page"):
  - o https://www.facebook.com/events/679910063109795
  - o https://www.facebook.com/harley.hungary
- Instagram page (hereinafter "Instagram Page"):
  - o https://www.instagram.com/hd120.budapest/
- YouTube channel:

   <u>https://www.youtube.com/channel/UCwi\_rCqs5YruFjEhe041SHg</u>
- TikTok Site (hereinafter referred to as "TikTok Site"):
  - https://www.tiktok.com/@hd120\_budapest
- Linkedin ("Linkedin Site"):
   <u>https://www.linkedin.com/company/harley-davidson-120th-budapest/</u>

(hereinafter collectively referred to as the "Community Sites" or "Community Site").

# 2.2. Purpose of the processing

The purpose of the processing of personal data is to operate the Community Sites and thereby to inform the Controller about the current information about the Event and the Event itself.

The purpose of the Community Pages is also to allow interested parties to express their opinions, reactions, questions, comments, reviews on the information posted on the Community Pages, and to contact the Event Organiser via private message on the Facebook Page (Messenger) and Instagram Page.

The Controller is entitled to moderate (delete from the Community Site) content that violates the terms of use of the Community Site or the Community Site in general, and, if necessary, to ban from the Community Site persons who regularly and/or seriously violate these terms of use, so that the Controller also moderates such violating content and bans from the Community Site the persons who engage in such activities.

The Controller is provided by the operator of the Community Site (see details below) with data from the Site Analytics function (hereinafter **"Site Analytics"**). The Site Analytics function displays aggregated data for the purpose of enabling the Controller to understand how visitors use the Community Sites.

The Controller reserves the right to organise promotions (e.g. prize draws) on the Community Site. The Controller will issue separate privacy notice(s) in relation to such promotional activities and the processing of data in connection therewith.

The Controller does not keep any records of the data subjects of the data processing on the Community Site, of their activities on the Community Site, does not process the personal data of the data subjects on the Community Site in any other way and for any other purposes than those mentioned above, and does not use the personal data of the data subjects for any other purposes than those mentioned above.

### 2.3. Legal basis for data processing

According to Article 6(1)(f) of the Regulation, the Controller has a legitimate interest, which is set out in the purpose of the processing.

# 2.4. Personal data processed

The Controller processes personal data on the Community Sites in the following cases:

- if the Community Site is being followed, or if the following is stopped: public data relating to the profile of the data subject (profile name, profile user ID);
- for activity on the Community Site, in relation to the Community Site: data relating to the activity, including posting, rating, sharing, commenting on, reacting to (e.g. liking);
- initiating a communication with the Community Site by private message: any information that the data subject brings to our attention during the communication;
- in case of violation of the terms of use of the Community Site or the Community Site in general, in order to moderate the offending content and to ban or block the person concerned from the Community Site: data related to this offending behaviour and public data related to the profile of the person concerned (profile name, profile user ID).

Personal data processed in connection with the Site Analytics feature:

The Site Analytics feature may be based on personal data collected by the Community Site operator from data subjects who visit or use the Community Site and its content. The scope of the personal data used for these Site Analytics is determined by the operator of the Community

Site and is viewed and processed exclusively by the operator of the Community Site. The Controller has no control over the scope of this personal data and cannot influence it in any way, and has no control over the processing of the Community Site. When using the Site Analytics function, the information is not individually tailored, but only displayed to us in aggregate form, as statistics, so we do not process any personal data in connection with the Site Analytics.

## 2.5. Source of personal data processed

The concerned and the Community Site.

## 2.6. Recipients of provided personal data

The Controller shall make the personal data of the data subject available only to its employees whose tasks include the management and operation of the Community Site.

The personal data of the data subject, with the exception of personal data provided in a private message, are data that the data subject discloses on the public area of the Community Site and are therefore accessible to anyone. The Controller has no control over the exact identity of the persons who have access to the data published on the Internet.

The personal data relating to the Community Site that is also displayed in the data subject's own profile (e.g. in the case of a post on the Facebook Page or a follow on the Instagram Page) may be accessed by those who otherwise have access to other similar data of the data subject published on the Community Site, in accordance with the data subject's user preferences. In this respect, the scope of those who are entitled to access (e.g. only friends, followers can see the data posted) is set by the data subject himself/herself.

The personal data contained in the private message will be known only to the Controller.

### 2.7. Transfer of personal data to a third country or international organisation

The Controller does not transfer the above personal data of the data subject to third countries or international organisations, but due to the borderless nature of the internet, the personal data posted by the data subject on the public areas of the Community Site (e.g. when posting comments or ratings) can be accessed by anyone who visits the Community Site.

### 2.8. Duration of processing of personal data

The Controller will process the personal data for as long as you are the administrator of the Community Site. The Controller has no control over how long the data is displayed by the operator of the Community Site.

### 2.9. Automated decision-making and profiling

Neither of these occurs during the processing.

### 2.10. Social networking sites used by the Controller

### (a) Facebook

Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; hereinafter referred to as **"Facebook Ireland"**) is a Controller and collects data about people who visit social networking pages, groups or events in accordance with its own privacy policy.

Facebook Ireland's General Privacy Notice is available at <u>https://hu-hu.facebook.com/privacy/explanation.</u>

For privacy issues, you can contact the Facebook Ireland Data Protection Officer at <u>https://www.facebook.com/help/contact/540977946302970</u>.

#### Facebook Page

The Facebook Page is a public platform, so any personal data posted by the data subject can be accessed by anyone without Facebook registration. Only Facebook users can react to and comment on content posted by the Company on the Facebook Page, write reviews and follow the Facebook Page. Facebook registration is not required to send a message, but registration is not required to use the Messenger messaging application.

The Controller, as the administrator of the Facebook Page, reserves the right to moderate certain reviews and comments published on the Facebook Page, if it considers that they violate the terms of use of Facebook or the Facebook Page (e.g. violent, sexual content), i.e. to delete these reviews and comments, and to ban from the Facebook Page persons who regularly and/or seriously violate the terms of use.

#### Information on joint data management

In connection with the Facebook Page, Facebook Ireland provides the Controller with data for the Page Analytics function. When processing the personal data used to create the Page Analytics, the Controller and Facebook Ireland act as joint controllers in accordance with Article 26 of the Regulation, subject to the judgment of the Court of Justice of the European Union in Case C-210/16.

Joint processing is permitted under Article 26 of the Regulation. Where the purposes and means of processing are determined jointly by two or more controllers, they are considered to be joint controllers.

The joint controllers shall define in a transparent manner, in an agreement between them, their respective responsibilities and the allocation of responsibilities for the performance of the obligations under the Regulation, in particular in relation to the exercise of the rights of the data subject and the provision of information to be made available to the data subject. The agreement is an appendix to the Controller of the Site Analysis function, available here: <a href="https://hu-hu.facebook.com/legal/terms/page\_controller\_addendum">https://hu-hu.facebook.com/legal/terms/page\_controller\_addendum</a>

Regardless of the terms of the agreement, the data subject may exercise his or her rights under the Regulation in relation to and against each controller.

In joint processing, all Controllers respect the rules on data protection and the processing of personal data.

More information about the data processing during the Site Analysis is available here: <a href="https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data">https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data</a>

### (b) Instagram

Facebook Ireland, as a separate Controller, collects data about individuals who visit individual Instagram profiles in accordance with its own privacy policy.

Facebook Ireland's general privacy notice for Instagram is available at <u>https://help.instagram.com/519522125107875.</u>

For privacy issues, you can contact the Facebook Ireland Data Protection Officer at <u>https://www.facebook.com/help/contact/540977946302970</u>.

The Instagram Page can be visited by anyone, and the photos and videos posted by the Company can be viewed by anyone, with the exception that our so-called stories - if not recorded on the Instagram Page - can only be accessed by followers of the Instagram Page. Only users with an Instagram account can like, comment on or send a private message to the Company on the Instagram Page, and only they can follow the Instagram Page. Only users with an Instagram account can see the comments made by the data subject to the content of the Instagram Page and followers of the Instagram Page.

The Controller reserves the right to moderate certain posts published on the Instagram Site if it considers that they violate the Terms of Use of Instagram or the Instagram Site (e.g. violent, sexual content), i.e. to delete these posts, to block persons who regularly and/or seriously violate the Terms of Use.

#### Information on joint data management

In connection with the Instagram Page, Facebook Ireland provides the Controller with data for the Page Analytics function. Given the fact that Instagram is a Facebook product, when processing the personal data used to generate the Page analytics for the Instagram Page, the Controller and Facebook Ireland act as joint controllers in accordance with Article 26 of the Regulation, subject to the judgment of the Court of Justice of the European Union in Case C-210/16.

Joint processing is permitted under Article 26 of the Regulation. Where the purposes and means of processing are determined jointly by two or more controllers, they are considered to be joint controllers.

The joint controllers shall define in a transparent manner, in an agreement between them, their respective responsibilities and the allocation of responsibilities for the performance of the obligations under the Regulation, in particular in relation to the exercise of the rights of the data subject and the provision of information to be made available to the data subject. The agreement is an appendix to the Controller of the Site Analysis function, available here: <a href="https://hu-hu.facebook.com/legal/terms/page\_controller\_addendum">https://hu-hu.facebook.com/legal/terms/page\_controller\_addendum</a>

Regardless of the terms of the agreement, the data subject may exercise his or her rights under the Regulation in relation to and against each controller.

In joint processing, all Controllers respect the rules on data protection and the processing of personal data.

More information about the data processing during the Site Analysis is available here: <a href="https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data">https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data</a>

### (c) TikTok

TikTok Technology Limited, 10 Earlsfort Terrace, D02 T380, Co. Dublin, Ireland; hereinafter referred to as **"TikTok Limited"**) as a Controller, collects data about people who visit social networking sites, groups or events in accordance with its own privacy policy.

TikTok Limited's General Data Protection Notice is available at <u>https://www.tiktok.com/legal/privacy-policy-eea?lang=hu.</u>

For privacy issues, you can contact the TikTok Limited Data Protection Officer at <u>https://www.tiktok.com/legal/report/DPO</u>

## (d) LinkedIn

LinkedIn Ireland Unlimited Company (70 Sir John Rogerson's Quay, Dublin 2, Dublin, D02r296, Ireland; hereinafter **"LinkedIn Ireland"**) is a Controller and collects data about people who visit social networking sites, groups or events in accordance with its own privacy policy.

LinkedIn Ireland's General Privacy Notice is available at <u>https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic\_footer-privacy-policy</u>.

For privacy issues, you can contact the LinkedIn Ireland Data Protection Officer at https://www.linkedin.com/help/linkedin/ask/TSO-DPO

## (e) Youtube channel

Google LLC (1600 Amphitheatre Parkway Mountain View, CA 94043 United States; hereinafter referred to as **"Google LLC"**) is a Controller and collects data about visitors to the YouTube channel in accordance with its own privacy policy.

Google LLC's General Data Protection Notice is available at <u>https://policies.google.com/privacy?hl=hu.</u>

The youtube privacy policy is available at the following link: <u>https://support.google.com/youtube/answer/7671399?p=privacy\_guidelines&hl=hu&visit\_id=636873724079445207-2532259155&rd=1</u>

You can lodge a data protection complaint by following the link below: <u>https://support.google.com/youtube/answer/142443</u>

The Data Protection enquiry form is available at the link below. https://support.google.com/policies/contact/general\_privacy\_form

# III. RIGHTS OF THE DATA SUBJECT IN RELATION TO THE PROCESSING

It is important for the Controller that its processing complies with the requirements of fairness, lawfulness and transparency. The data subject may exercise at any time his or her rights under the Regulation in relation to the processing.

### 3.1. Right to information

The data subject shall have the right to be informed about the processing of the data, which the Controller shall provide by means of this Notice.

### 3.2. Processing based on consent

Where the legal basis for a processing operation is the data subject's consent, he or she has the right to withdraw his or her consent to the processing at any time. It is important to note, however, that the withdrawal of consent may only relate to data for which there is no other legal basis for processing. If there is no other legal basis for the processing of the personal data concerned, the Controller will permanently and irretrievably delete the personal data following the withdrawal of consent. Withdrawal of consent under the Regulation shall not affect the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.

# 3.3. Access rights

At the request of the data subject, the Controller shall at any time, unless it is restricted by a legitimate interest, inform the data subject whether or not his or her personal data are being processed and, if so, provide access to the personal data and the following information:

- the purposes of the processing;
- the legal basis for the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom or with which the Controller has disclosed or will disclose the personal data, including in particular recipients in third countries or international organisations;
- the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;
- the data subject shall also be informed of his or her right to obtain from the Controller the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data;
- the right to lodge a complaint with a supervisory authority or to take legal action;
- where the data have not been collected directly from the data subject by the Controller, any available information on the source of the data;
- where automated decision-making is carried out, the fact of such processing, including profiling, and, at least in those cases, the logic used, i.e. the significance of such processing and the likely consequences for the data subject.

## 3.4. Right to rectification of personal data

The data subject shall at any time have the right to obtain, at his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her by the Controller. Taking into account the purpose of the processing, the data subject shall also have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

In the case of a request for rectification (amendment) of data, the data subject must substantiate the accuracy of the data requested to be amended and must also certify that the person entitled to the amendment is the person who requests the amendment. Only in this way can the Controller assess whether the new data is accurate and, if so, whether it can amend the previous data.

If it is not clear whether the data processed is correct or accurate, the Controller does not correct the data, but only marks it, i.e. indicates that the data subject has objected to it, but it may not be incorrect. The Controller shall, without undue delay, correct inaccurate personal data or supplement the data concerned by the request, after confirming the authenticity of the request. The Controller shall notify the data subject of the correction or marking.

The Controller further draws the attention of the data subject to the need to notify any change in his/her personal data as soon as possible, thus facilitating lawful processing and the exercise of his/her rights.

# 3.5. Right to erasure ("right to be forgotten")

At the request of the data subject, the Controller shall delete personal data relating to the data subject without undue delay where one of the following grounds applies:

- the Controller no longer needs the personal data for the purposes for which they were collected or otherwise processed;
- where processing is based on consent, the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing or objects to processing for direct marketing purposes;
- the personal data are unlawfully processed by the Controller;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to the Controller;
- personal data are collected in connection with the provision of information society services.

There may be important reasons or interests which may allow the processing of the data subject's data even if he or she has objected to it (for example, the exercise of the right to freedom of expression and information, or if it is necessary for the establishment, exercise or defence of legal claims).

## 3.6. Right to restriction of processing

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the Controller if one of the following conditions is met:

- contests the accuracy of the personal data; in this case, the restriction applies for the period of time that allows the Controller to verify the accuracy of the personal data;
- the data processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use;
- the Controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Controller prevail over the legitimate grounds of the data subject.

Where the data are subject to restriction, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State. The Controller shall inform the data subject in advance of the lifting of the restriction on processing.

# 3.7. Right to objection

Where the processing of personal data is based on the legitimate interests of the controller [Article 6(1)(f) of the Regulation] or is necessary for the performance of a task carried out in the exercise of official authority vested in the controller [Article 6(1)(e) of the Regulation], the data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data, including profiling based on those provisions.

Where the data subject's personal data are processed by the Controller for direct marketing purposes (e.g. sending information letters), the data subject has the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing. If the data subject objects to the processing of his or her personal data for direct marketing purposes, the personal data may no longer be processed for those purposes.

## 3.8. Interest balancing test

Where the legal basis for the processing of personal data is the legitimate interest of the controller or a third party within the meaning of Article 6(1)(f) of the Regulation and, consequently, a written "balancing of interests test" has been carried out pursuant to preamble paragraph 47 and Article 5(2), the data subject may request it by sending an e-mail to gdpr@sportugynokseg.hu.

## 3.9. 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 the Controller in a structured, commonly used, machine-readable format and the right to have those data transmitted by the Controller to another controller if:

- a) processing is based on the data subject's consent or on a contract within the meaning of Article 6(1)(b) of the Regulation; and
- b) the processing is carried out by automated means.

# IV. PROCEDURES FOR ENFORCING THE RIGHTS OF THE DATA SUBJECT

The data subject can exercise the above rights by sending an e-mail to <u>gdpr@sportugynokseg.hu</u>, by sending a private message on the Community Site, by post to the Controller's headquarters or by visiting the Controller's headquarters in person. The Controller shall start the examination and execution of the data subject's request without undue delay upon receipt. The Controller shall inform the data subject of the action taken on the basis of the request within 30 (thirty) days of its receipt. Where the Controller is unable to comply with the request, it shall inform the data subject of the refusal and of his or her rights of appeal within 30 (thirty) days.

Within 5 (five) years after the death of the data subject, the rights of the deceased as set out in this Notice, which the data subject enjoyed during his or her lifetime, may be exercised by a person authorised by the data subject by means of an administrative order or a declaration in a public or private document of full probative value made to the Controller or, if the data subject made several declarations to a controller, by a declaration made at a later date. If the data subject has not made a corresponding declaration, his or her close relative within the meaning of Act V of 2013 on the Civil Code may, even in the absence of such a declaration, exercise the rights under Articles 16 (right of rectification) and 21 (right of access to data) of the Regulation. (right to object) and, if the processing was already unlawful during the lifetime of the data subject, to exercise the rights of the deceased during his or her lifetime as provided for in Articles 17 (right of erasure) and 18 (right to restriction of processing) of the Regulation within 5 (five) years of the data subject. The right to enforce the rights of the data subject under this paragraph shall lie with the next of kin who first exercises that right.

# V. RIGHT TO LEGAL REMEDY WITH REGARD TO THE PROCESSING

In order to enforce his or her right to judicial remedy, the data subject may take legal action against the Controller if he or she considers that the Controller or a processor acting on his or her behalf or under his or her instructions is processing his or her personal data in breach of the provisions of the law on the processing of personal data or of binding legal acts of the European Union. The court shall decide the case out of turn. The Tribunal shall have jurisdiction to hear the case. The lawsuit may be brought, at the choice of the data subject,

before the court of the place of residence or domicile of the data subject or before the court of the seat of the Controller (Budapest District Court).

You can find the court in your place of residence or domicile at <u>https://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso</u>.

Anyone may file a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) against the Controller, alleging that the processing of personal data has resulted in a violation of rights or an imminent threat thereof, or that the Controller is restricting the exercise of rights related to the processing of personal data or is refusing to exercise such rights. The notification can be made using one of the following contact details:

National Authority for Data Protection and Freedom of Information (NAIH) Postal address: 1363 Budapest, Pf. 9. Address: 1055 Budapest, Falk Miksa utca 9-11. E-mail: <u>ugyfelszolgalat@naih.hu</u> URL: http://naih.hu

The Controller is committed to implementing the principles of lawful, transparent and fair processing, and will take prompt action to clarify the issues raised and remedy the identified harm in situations it considers to be prejudicial. Consequently, we recommend that you contact the Controller via the contact details provided in this Notice before taking legal action before the National Authority for Data Protection and Freedom of Information or before a court of law. You will be informed of the findings and the measures taken, and, if you have any questions regarding the processing, you will be informed within the time limits set by the applicable legislation.

The Sportmarketing Agency Ltd., as the Controller, is not liable for the consequences of the inaccurate provision of data.

Budapest, 12 May 2023.

# Annex 1:

Definitions relating to the processing of personal data

- **controller**: the legal entity that determines the purposes and means of the processing of personal data;
- data processing: any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- transfer: making data available to a specified third party;
- **erasure**: rendering data unrecognisable in such a way that their recovery is no longer possible;
- data marking: the marking of data with an identification mark to distinguish them;
- **restriction of processing**: marking of stored personal data with a view to limiting their future processing;
- data destruction: the total physical destruction of a storage medium containing data;
- processor: a legal person who processes personal data on behalf of the controller;
- **recipient**: a natural or legal person, public authority, agency or any other body to whom or with which personal data are disclosed, whether or not a third party;
- data subject: means a natural person who is identified or identifiable; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **third party**: a natural or legal person, public authority, agency or any other body which is not the same as the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- **consent of the data subject**: a freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies, by a statement or by an act unambiguously expressing his or her consent, that he or she signifies his or her agreement to the processing of personal data relating to him or her;
- personal data: any information relating to the data subject;
- **objection**: a statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data.