



DATA PROTECTION AND PRIVACY NOTICE

(DATA MANAGEMENT RELATED TO THE ACCREDITATION OF VOLUNTEERS)

I. PRESENTATION OF THE CONTROLLER

The **Sportmarketing Agency Ltd.** (hereinafter referred to as "**Controller**" or "**Event Organizer**") attaches great importance to respecting the right of information self-determination of its partners, customers and visitors during the HARLEY-DAVIDSON® 120th ANNUAL EVENT (hereinafter referred to as "**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 organisational measures to ensure the security, confidentiality, integrity and availability of the data.

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 (Regulation (EU) 2016/679). In order to protect the personal data processed **during the recruitment and selection of volunteers participating in the Event and to ensure the necessary conditions for the performance of their activities, and their accreditation**, the following information notice (hereinafter referred to as the "**Notice**") is published.

The Notice is valid from **12.05.2023** until its withdrawal in relation to the processing of personal data of data subjects **in the course of the recruitment and selection of volunteers and the provision of the conditions necessary for the performance of their activities, and their accreditation by the Controller.**

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.
postacímé:	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 Infotv.**");

- 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 following data management purposes (processes) can be distinguished in the process of recruiting and selecting volunteers under this Notice and ensuring the necessary conditions for the performance of their activities:

- recruiting volunteers, assessing applications
- creation of a voluntary database
- volunteering

A. Recruiting volunteers, assessing applications

Volunteers can apply for the advertised positions by registering on the website <https://hd120budapest.hu/site/hu/kapcsolat/onkentes> and the Controller selects the volunteers to be employed after personal or online interviews. A volunteer may be a person of legal age who is not incapacitated or excluded.

The Controller concludes with the volunteers a contract of assignment sufficient for the performance of their activities, so in this respect the data provided during the application are also necessary for the preparation of the contract of assignment to be concluded with the selected volunteers.

In connection with the recruitment of volunteers and the assessment of applications, the Controller processes personal data.

2.1. Purpose of data processing

To carry out the selection process for the advertised volunteer positions and, during the selection process, to get to know the professional and human qualities, language skills and previous work experience of the candidates, to check the legal conditions for the performance of volunteer activities in order to select the right persons for the volunteer positions required at the events and to take the necessary steps to prepare the contract of assignment to be concluded with the volunteers.

2.2. Legal basis for data processing

The processing of personal data is necessary to take steps at the request of the data subject prior to the conclusion of the contract of engagement, and the legal basis for the processing is therefore Article 6(1)(b) of the Regulation.

By sending his/her application, the data subject expresses his/her clear intention to fill the volunteer position indicated and to participate in the selection process required for this purpose. As a necessary part of the selection process, the Controller will assess the professional and personal qualities of the candidate, including any necessary language skills, in order to be able to assess the candidate's suitability for the position.

2.3. Personal data processed

The personal data provided by the data subject during registration, personal interviews or online interviews, such as the data necessary to process the registration, to identify and contact the data subject, to verify the existence of the legal conditions for carrying out voluntary activities and to assess the suitability for the position applied for.

The Controller processes the following personal data of the data subjects:

- a) surname, (identification)
- b) first name, (identification)
- c) portrait, (identification)
- d) no, (identification and classification of the task to be performed)
- e) age, (eligibility determination)
- f) phone number, (contact)
- g) e-mail address, (contact)
- h) highest level of education, (to determine suitability and the classification of the duties to be performed)
- i) indication of the school which awarded the qualification, (aptitude test)
- j) details of previous work experience (to establish suitability and the job classification to be performed)

2.4. Categories of persons concerned

Volunteering is only open to those who submit their application via the online application form and are selected through the selection process, sign the volunteering contract and agree to comply with the terms of the contract.

2.5. Source of the personal data processed

The source of personal data is the data subject applying for the voluntary position. Since the data subject is the source of the personal data, the final scope of the data processed is communicated directly to him/her by the Controller at the time of their collection.

2.6. Recipients of provided personal data

The Controller has primary access to the personal data processed. The personal data of the data subject may only be processed by the Controller's employees whose job duties give them the right to make suggestions or decisions in relation to the advertised voluntary positions.

Processor(s):

The Processor, acting on behalf of and under the instructions of the Controller, may process the personal data of the data subject only for the purposes specified by the Controller and contractually agreed upon, in accordance with the instructions of the Controller, and shall not

have the right to make its own decisions with regard to the processing. The Processor shall be bound by confidentiality obligations and contractual guarantees regarding the retention of personal data obtained in the course of its tasks.

The Controller uses the services of the following Processor for the processing of applications:

Processor details:	
Name of the Processor:	Netmask Interactive Ltd.
Seat:	1131 Budapest, Nővér u. 110
Tax number:	23134339-2-41
Company registration number:	01-09-954570
represents:	Tamás Szomor
E-mail:	info@netmask.hu
Activity covered:	Hosting service

Processor details:	
Name of the Processor:	Syscode Ltd.
Seat:	1115 Budapest, Bartók Béla út 152/H.
Tax number:	13817820-2-43
Company registration number:	01-09-874820
represents:	Balázs Kosdi
E-mail:	info@syscode.hu
Activity covered:	Website development, Content update

2.7. Transfer of personal data

Personal data as defined in point 2.3 of this Notice will not be transferred to third countries or international organisations.

2.8. Duration of processing of personal data

The Controller will process the personal data provided for the purposes described in this section until the advertised voluntary positions are filled, i.e. until the selection process is completed.

2.9. Automated decision-making and profiling

The Controller does not make a decision based solely on automated processing in relation to the data subject and does not profile the data subject on the basis of the available personal data.

2.10. Processing techniques

The Controller processes the personal data of the data subject electronically.

2.11. Supply of personal data

The provision of personal data is mandatory for the registration process, which is necessary to participate in the further selection process. Due to the voluntary nature of the activity, registration is not compulsory.

B. Create a voluntary database

In order to avoid having to repeat the selection procedure in its entirety for future events, the Controller will keep a register of previously selected volunteers, to which the data subjects may voluntarily subscribe.

2.12. Purpose of data processing

Create a voluntary database. Processing of personal data of data subjects who have voluntarily consented to the database in order to enable the Controller to find suitable volunteers for available positions for future events as soon as possible.

2.13. Legal basis for data processing

The Controller processes the personal data of the data subject on the basis of Article 6(1)(a) of the Regulation, i.e. on the basis of the data subject's consent.

2.14. Personal data processed

The data provided by the data subject during the application process, which are necessary to identify and contact the data subject and to identify the volunteer position for which he or she has applied and is suitable for the position.

The Controller processes the following personal data of the data subjects:

- a) surname, (identification)
- b) first name, (identification)
- c) portrait, (identification)
- d) no, (identification and classification of the task to be performed)
- e) age, (eligibility determination)
- f) phone number, (contact)
- g) e-mail address, (contact)
- h) highest level of education, (to determine aptitude and the classification of the duties to be performed)
- i) indication of the school which awarded the qualification, (aptitude test)
- j) details of previous work experience (to establish suitability and the job classification to be performed)

2.15. Categories of persons concerned

Volunteering is only open to those who submit an application via the online application form and are selected through the selection process, sign a volunteering contract and agree to comply with the terms of the contract.

2.16. Source of the personal data processed

The source of personal data is the data subject selected as a volunteer. As the data subject is the source of the personal data, any changes to the scope of the data processed are communicated directly to the Controller at the time of their inclusion.

2.17. Recipients of provided personal data

The personal data are processed by the Controller only by its employees who have the right to make suggestions or decisions in relation to the advertised voluntary positions.

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

The personal data specified in point 2.14 of this Notice will not be transferred to third countries or international organisations.

2.19. Duration of processing of personal data

The data will be processed until the data subject's consent is withdrawn, but for a maximum period of 2 (two) years from the date of connection to the database.

The data subject shall have the right to withdraw his or her consent to the processing at any time by notifying the Controller of his or her intention to do so using any of the contact details specified in this notice.

2.20. Automated decision-making and profiling

The Controller does not make decisions based solely on automated processing in relation to the data subject and does not profile the data subject on the basis of the available personal data.

2.21. Processing techniques

The Controller processes the personal data of the data subject electronically.

2.22. Supply of personal data

The provision of personal data is mandatory for voluntary registration, which is required for further participation in the selection process. Due to the voluntary nature of the activity, registration is not compulsory. However, during registration, the applicant is free to decide whether or not to be included in the voluntary database. This consent is not a condition for the submission of an application and will not be taken into account in the assessment of the application, and may be withdrawn at any time without giving reasons.

C. Volunteering

The Controller concludes a contract of engagement with the selected volunteers, which includes the provision of the conditions necessary for the performance of the contract, including the preparation of a photo identification card (accreditation) for access to the place of work.

Volunteers only receive benefits that do not constitute remuneration (e.g. meals, working clothes).

2.23. Purpose of data processing

The conclusion and performance of the voluntary contract, including the conditions and benefits necessary for the performance of the voluntary activity.

2.24. Legal basis for data processing

The processing of personal data is necessary for the performance of a contract with the data subject and therefore the legal basis for the processing is Article 6(1)(b) of the Regulation and, as regards data relating to food sensitivities, the legal basis for the processing is the consent of the data subject pursuant to Article 6(1)(a) of the Regulation.

Data on food sensitivities as health data fall into a special category of personal data. The exception for their processing is Article 9(2)(a) of the Regulation, i.e. the processing is based on the explicit consent of the data subject.

2.25. Personal data processed

Data relating to the conclusion and performance of the voluntary contract, including data necessary to identify and contact the data subject and to provide the conditions and benefits necessary for the performance of the voluntary activity, in particular the issue of a photo ID card, the provision of meals, any special dietary requirements, food sensitivities and appropriate work clothing.

The Controller processes the following personal data of the data subjects:

i. Conclusion of a contract of engagement

- a) Surname
- b) first name
- c) place and date of birth
- d) mother's name
- e) permanent address
- f) tax identification number

ii. Issue of admission card

- a) surname, (identification)
- b) first name, (identification)
- c) face image (identification)
- d) scope of access rights

iii. Contact

- a) phone number
- b) e-mail address

iv. Performing a task

- c) dress size
- d) language skills
- e) food allergy

2.26. Categories of persons concerned

Volunteering is only open to those who submit an application via the online application form and are selected through the selection process, sign a volunteering contract and agree to comply with the terms of the contract.

2.27. Source of personal data processed

The source of the personal data is the data subject who is a volunteer. As the data subject is the source of the personal data, the Controller will inform him/her directly of the final scope of the data processed at the time of their collection.

2.28. Recipients of provided personal data

Personal data are processed by the Controller only by its employees who perform tasks related to the performance of the voluntary activity.

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

Personal data as defined in point 2.25 of this Notice will not be transferred to third countries or international organisations.

2.30. Duration of processing of personal data

In the case of a written contract, the Controller is obliged to keep the written voluntary contract for 5 (five) years from its termination, pursuant to Section 6 (6) of Act LXXXVIII of 2005 on Voluntary Activities in the Public Interest.

Other personal data not included in the contract related to the performance of the voluntary activity, in particular data related to the access card and any special diet, as well as data necessary for the provision of work clothing, will be processed by the Controller until the end of the Event concerned by the voluntary activity.

2.31. Automated decision-making and profiling

The Controller does not make decisions based solely on automated processing in relation to the data subject and does not profile the data subject on the basis of the available personal data.

2.32. Processing techniques

The Controller processes the personal data of the data subject electronically.

2.33. Supply of personal data

The provision of personal data is mandatory for the registration process, which is necessary to participate in the further selection process. Due to the voluntary nature of the activity, registration is not compulsory.

III. DATA SECURITY

The Controller and the Processors shall have the right to access the personal data of the data subject only to the extent necessary for the performance of their tasks.

The Controller shall transfer personal data in a uniform, pre-audited and secure manner, while informing the data subject, avoiding redundant data transfers or data transmission through different registration platforms.

In order to ensure data security, the Controller shall assess and record all data processing activities carried out by it.

On the basis of the records of processing activities, the Controller shall carry out a risk analysis to assess the conditions under which each processing operation is carried out and the risk factors that may cause a breach or a potential data protection incident during processing. The risk analysis shall be carried out on the basis of the actual data processing activity. The purpose of the risk analysis shall be to determine the security rules and measures that effectively ensure the adequate protection of personal data in accordance with the performance of the controller's activities.

The Controller shall implement appropriate technical and organisational measures to ensure and demonstrate that the processing of personal data is carried out in accordance with the GDPR, taking into account the nature, scope, context and purposes of the processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons. Including, where applicable:

- the pseudonymisation and encryption of personal data;
- the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;

- in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;
- a procedure to test, assess and evaluate regularly the effectiveness of the technical and organisational measures taken to ensure the security of processing.

In determining the appropriate level of security, explicit account should be taken of the risks arising from the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

The Controller shall implement appropriate technical and organisational measures to ensure that, by default, only personal data that are necessary for the specific purpose of the processing are processed. This obligation relates to the amount of personal data collected, the extent to which they are processed, the duration of their storage and their availability. These measures should in particular ensure that personal data cannot, by default, be made available to an indeterminate number of persons without the intervention of the natural person.

In the event of damage or destruction of personal data, attempts should be made to replace the damaged data as far as possible from other available data sources. The fact of the replacement shall be indicated on the replaced data.

The Controller protects its internal network with multiple layers of firewall protection. At all access points to the public networks used, a hardware firewall (border protection device) is installed at all times. Data is stored redundantly, i.e. in multiple locations, by the Controller to protect it from destruction, loss, damage or unlawful destruction due to IT equipment failure.

Protect your internal networks from external attacks with multi-layered, active, complex malware protection (e.g. virus protection).

The Controller shall take the utmost care to ensure that its IT tools and software continuously comply with the technological solutions generally accepted in the market.

IV. 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.

4.1. 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.

4.2. 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 erase 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.

4.3. 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.

4.4. Right to rectification of personal data

The data subject shall have the right at any time, upon request and without undue delay, to obtain from the Controller the rectification of inaccurate personal data relating to him or her. Taking into account the purposes 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.

4.5. 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).

4.6. 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.

4.7. 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.

4.8. 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 (47) and Article 5(2), the data subject may request it by sending an e-mail to gdpr@sportugynokseq.hu.

4.9. 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.

V. PROCEDURES FOR ENFORCING THE RIGHTS OF THE DATA SUBJECT

The data subject may exercise the above rights by sending an e-mail to gdpr@sportugynokseq.hu, by post to the Controller's head office or by visiting the Controller's head office in person. The Controller shall investigate and act on the data subject's request without undue delay after receipt of the request. 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 reasons for the refusal and of his or her rights of appeal within 30 (thirty) days.

Within 5 (five) years of 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 or if the purpose of the processing ceased to exist upon the death 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 death 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.

VI. THE 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 <https://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

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: ugyfelszolgalat@naih.hu
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. 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.