



## V4 COMPETITION LAW & FUNDAMENTAL RIGHTS CHALLENGE

### PRIVACY NOTICE

#### I. JOINT PROCESSING OF DATA BY THE HUNGARIAN COMPETITION AUTHORITY, THE ALLIANCE FOR FUNDAMENTAL RIGHTS FOUNDATION AND THE OFFICE OF THE COMMISSIONER FOR FUNDAMENTAL RIGHTS

Chapter I of this Privacy Notice describes the processing of personal data and the purposes of processing as well as the privacy rights you are entitled to in connection with the "V4 Competition Law & Fundamental Rights Challenge" study contest (hereinafter: '**Study Contest**') and the award conference connected with the announcement of the results (hereinafter: '**Award Ceremony**'), organised jointly by the Hungarian Competition Authority, the Alliance for Fundamental Rights Foundation and the Office of the Commissioner for Fundamental Rights.

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| 1. JOINT CONTROLLERS:                        | <p>The <b>Hungarian Competition Authority</b> (hereinafter: 'GVH'; registered office: 1054 Budapest, Alkotmány utca 5, represented by Csaba Balázs Rigó, President, Data Protection Officer: Dr. Viktória Ágnes Lechner, contact: <a href="mailto:adatvedelem@gvh.hu">adatvedelem@gvh.hu</a>), the Alliance for Fundamental Rights Foundation (hereinafter: 'Foundation', registered office: 1025 Budapest, Gül Baba utca 11; represented by: Dr. Krisztina Budavári, Curator; the Foundation did not appoint a data protection officer; e-mail: <a href="mailto:budavarikrisztina@gmail.com">budavarikrisztina@gmail.com</a>) and the <b>Office of the Commissioner for Fundamental Rights</b> (hereinafter: '<b>AJBH</b>' (Hungarian abbreviation), registered office: 1055 Budapest, Falk Miksa utca 9-11, tax number: 15795764-1-41, represented by: Dr. Ákos Kozma, Commissioner for Fundamental Rights, data protection officer: Dr. Attila Gulyás, contact: <a href="mailto:gulyas.attila@ajbh.hu">gulyas.attila@ajbh.hu</a>) jointly organise and host the Study Contest and the Award Ceremony related to the announcement of the results (hereinafter collectively: 'Events'), in connection with the organisation of which the GVH hereby informs the Foundation and the AJBH (hereinafter collectively: '<i>Parties</i>', '<i>Controllers</i>') jointly determine the purposes and means of the processing of the data detailed in Chapter 1 of this Notice. As such, they are considered as joint controllers, in relation to which the Parties have entered into an agreement.</p> |
| 2. ESSENCE OF THE JOINT CONTROLLER AGREEMENT | <p>The organisation of the Events shall be ensured by the GVH, the Foundation and the AJBH as follows:</p> <ul style="list-style-type: none"> <li>• the Foundation will perform the tasks of the organisation and holding of the Award Ceremony, and</li> </ul>  |

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|  | <ul style="list-style-type: none"> <li>• the GVH will provide technical support for the event, and</li> <li>• the AJBH will cover the costs of the special prize for the winner of the law student theme "The impact of European integration on the development of consumer rights" and their consultant.</li> </ul> <p>The information on joint data processing will be made available by the GVH on the GVH Study Contest platform. In order to enforce the data subject's rights in relation to the jointly processed data, the data subject may contact either party. The Parties shall mutually inform each other if the data subject approaches them in order to exercise their rights under the General Data Protection Regulation, provide each other with all information necessary to exercise the data subject's rights and decide, in consultation with each other, on any action to be taken in order to exercise those rights.</p> <p>The Parties have agreed that the data protection officer of the GVH will be in contact with the data subject. The Foundation and the CMAA shall assist the latter in fulfilling its obligation to respond to requests related to the exercise of the rights of the data subject. The Parties shall immediately inform each other of any data protection incident learnt by them and shall decide on the necessary action in consultation with each other. The incident shall be notified by the GVH to the Authority and, if necessary, the GVH Data Protection Officer shall inform the data subject about it.</p> <p>Beyond the above, the Parties shall independently fulfil their obligations under applicable data protection legislation. The Parties shall be separately and independently responsible for the notification to the competent authorities of any data protection incident which occurred within the scope of their respective control and over which the other Party had no control.</p> |
| <p>3. PURPOSES AND LEGAL GROUNDS FOR THE PROCESSING OF JOINTLY PROCESSED PERSONAL DATA</p> | <p>The Controllers process the personal data of the data subjects as participants in the Events (applicants, consultants, jury members) in the context of the Joint Processing for the purposes of receiving applications, contacting them and organising the Events, on the basis of the following legal grounds:</p> <p>1) Applicants may apply for the Study Contest as data subjects by sending an e-mail, together with the study and the attachments required by the competition notice, to <a href="mailto:palyazat@gvh.hu">palyazat@gvh.hu</a>. The legal ground for the processing of data for the purpose of receiving the application and for the purpose of contacting the applicant:</p> <ul style="list-style-type: none"> <li>• The processing of personal data by the GVH is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller [<b>Article 6(1)(e) GDPR</b>], having regard to the provisions of Section 33 (4) of the Competition Act. In this context, the GVH shall inform the data subject of their right to object to the processing of data for this purpose.</li> <li>• The legal ground for the processing on the part of the Foundation is the legitimate interest of the Foundation [<b>Article 6(1)(f) GDPR</b>]. The Foundation has a legitimate interest in processing the names and e-mail addresses of data subjects in connection with events</li> </ul>  |

organised jointly with the Foundation. In this context, the Foundation informs the data subject of their right to object to the processing of data for this purpose.

- The processing of personal data by the Foundation is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller [**Article 6(1) e GDPR**], having regard to the provisions of Section 2 (5) of the Act on the Commissioner for Fundamental Rights. In this context, the GVH shall inform the data subject of their right to object to the processing of data for this purpose.

2) Subject to their consent, a photograph of the participants shall be taken during the organisation of the Award Ceremony in order to ensure adequate publicity of the Study Contest and its final result. With the further consent of the participants, these photographs will be published on the GVH website, Facebook, Twitter, YouTube and LinkedIn. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the photograph will be deleted.

Legal basis for processing the photos:

- the consent of the data subject on the part of the GVH [**Article 6(1)(a) GDPR**]. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the photograph of the data subject will be deleted.
- Consent of the data subject on behalf of the Foundation [**Article 6(1)(a) GDPR**]. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the photograph of the data subject will be deleted.
- The consent of the data subject on the part of AJBH [**Article 6(1) a GDPR**]. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the photograph of the data subject will be deleted.

3) In the event of consent, a video recording of the participants in the Award Ceremony will be made for the purpose of ensuring adequate publicity of the Study Contest and its outcome. With the further consent of the data subjects, these recordings will be published on the GVH website, Facebook, Twitter, YouTube and LinkedIn. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the part of the video in which the participant appears will be deleted.

Legal ground for the processing of video recordings:

- the consent of the data subject on the part of the GVH [**Article 6(1)(a) GDPR**]. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the recording of the data subject shall be deleted.

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|  | <ul style="list-style-type: none"> <li>• Consent of the data subject on behalf of the Foundation [<b>Article 6(1)(a) GDPR</b>]. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the recording of the data subject shall be deleted.</li> <li>• The consent of the data subject on the part of AJBH [<b>Article 6(1) a) GDPR</b>]. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the recording of the data subject shall be deleted.</li> </ul>  |
| <p><b>4. TYPE OF PERSONAL DATA PROCESSED JOINTLY</b></p>                           | <p>The Parties shall process the following personal data:</p> <ol style="list-style-type: none"> <li>1) The name and e-mail address of the participants for the purpose of receiving the entries and contacting them.</li> <li>2) For the purposes of the organisation of the Award Ceremony, the Controllers shall process the participants' photographs taken at the Award Ceremony in order to ensure adequate publicity of the Study Contest and its results.</li> <li>3) For the purposes of the organisation of the Award Ceremony, the Controllers shall process video recordings of the participants in the Award Ceremony in order to ensure adequate publicity of the Study Contest and its results.</li> </ol>   |
| <p><b>5. DURATION OF STORAGE OF JOINTLY PROCESSED PERSONAL DATA</b></p>            | <p>The Controllers:</p> <ul style="list-style-type: none"> <li>• shall process personal data referred to in section 1) for a period of 1 year after the Award Ceremony,</li> <li>• shall process personal data under Sections 2-3) until the withdrawal of consent.</li> </ul>  |
| <p><b>6. PROCESSORS</b></p>  | <p>The company(ies) contracted for the Award Ceremony will take photographs and video recordings of the participants.</p> <p>Further information on the processors used in connection with the Award Ceremony and further information on the data processing in connection with the Award Ceremony will be provided in the related Privacy Notice.</p>  |
| <p><b>7. RECIPIENT(S) OF DATA TRANSFERS IN THE CONTEXT OF JOINT PROCESSING</b></p> | <p>For the duration of the Events, the personal data of the data subjects referred to in Section 1) will be accessed by persons directly involved in the organisation of the Events on a need-to-know basis on behalf of the GVH.</p> <p>The personal data of the data subjects referred to in Section 1) will be accessed by the curator on behalf of the Foundation.</p> <p>The personal data of the data subjects referred to in Section 1) may be accessed by the persons directly involved in the organisation of the Events on behalf of the AJBH.</p> <p>The Parties shall not transfer the personal data processed pursuant to Section 1) outside the European Union or the European Economic Area or to international organisations.</p> <p>Images and video footage of the participants of the Award Ceremony pursuant to Sections 2-3) may be accessed by anyone on the GVH website,</p> |

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|  | <p>Twitter, YouTube, Facebook and LinkedIn, subject to the consent of the data subjects.</p> <p>The Controllers hereby further inform you that the uploading of images and videos of the Award Ceremony to the GVH website LinkedIn, Twitter, YouTube and Facebook pages constitutes a transfer of personal data to a third country, given that the services of these social networking sites require the flow of data from the European Union to the United States and back. The transfer of personal data to third countries by Twitter Inc, Meta Platform Ireland Limited, Google LLC and LinkedIn Ireland Unlimited is based on the Commission Implementing Decision (EU) 2021/914, to which the standard contractual clauses set out in the Annex apply.</p> <p>Please also note that the Foundation does not have access to personal data that are independently processed by the GVH (see Chapter II of this Privacy Notice). The AJBH does not have access to personal data held by the GVH except in the cases specified in Chapter II, Section 6.</p>  |
| <p><b>8. YOUR RIGHTS IN RELATION TO JOINT PROCESSING</b></p> | <p>The data subject has the following rights in relation to the joint processing of the Parties:</p> <ol style="list-style-type: none"> <li><b>1. Access rights:</b> You have the right to request information about the personal data held about you, the legal ground, purpose and duration of the processing of your personal data, the source of the personal data, to whom, when and under which law the Controllers have granted access to your personal data, your data subject rights and your right to lodge a complaint with a supervisory authority.</li> <li><b>2. Right to rectification:</b> If necessary, you may request the rectification of your personal data at the contact details of the Controllers provided above. The Controllers shall comply with the request without undue delay and shall inform the data subject thereof using the contact details provided by the data subject. The rectification of personal data will be communicated to those to whom the personal data have been disclosed, unless this is impossible or involves a disproportionate effort. Upon request, we will inform you of these recipients.</li> <li><b>3. Right to the restriction of processing:</b> You also have the right to request restriction of the processing of your personal data if one of the following conditions is met: <ol style="list-style-type: none"> <li><b>a)</b> you contest the accuracy of your personal data, in which case the restriction applies for the period during which the Controllers verify the accuracy of the personal data;</li> <li><b>b)</b> the processing is unlawful and you oppose the erasure of the data, in which case you request the restriction of their use instead;</li> <li><b>c)</b> the Controllers no longer require the personal data for data processing purposes, but you request the data for the submission, enforcement or defence of legal claims;</li> <li><b>d)</b> the Supervisory Authority orders it.</li> </ol> </li> </ol> |

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|                                       | <p>Should the data be subject to restriction, the personal data shall, with the exception of storage, only be processed with the consent of the data subject or for the submission, enforcement or defence of legal claims, for the protection of the rights of other natural or legal persons or for reasons of important public interest of the European Union or of a Member State. The data subject will be informed in advance of the lifting of the restriction on processing. The restriction of the personal data will be communicated to those to whom the personal data have been disclosed, unless this is impossible or involves a disproportionate effort. Upon request, we will inform you of these recipients.</p> <p><b>4. Right to erasure (right to be forgotten):</b> You have the right to request the erasure of your personal data. The Controllers erase your personal data:</p> <ul style="list-style-type: none"> <li>a) if the personal data are no longer required for the purpose for which they were collected or otherwise processed;</li> <li>b) when consent is withdrawn,</li> <li>c) when the data subject objects to the processing, and there is no prevalent legitimate reason for the processing of the data,</li> <li>d) when the processing is unlawful; or</li> <li>e) when they have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject.</li> </ul> <p>The erasure of the personal data will be communicated to those to whom the personal data have been disclosed, unless this is impossible or involves a disproportionate effort. Upon request, we will inform you of these recipients.</p> <p><b>5. Right to objection:</b></p> <p>You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, which is based on Article 6(1) e) or f), including profiling based on those provisions. In such a case the Controllers shall no longer process the personal data unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the submission, enforcement or defence of legal claims.</p> <p>A request to exercise the above rights may be made to any of the controllers, but will be executed by the GVH for processing subject to the joint processing agreement described above.</p> |
| <p><b>9. LEGAL REMEDY OPTIONS</b></p> | <p>In addition to the above, you may submit a complaint or a request to the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11, phone: +36-1-391-1400, fax: +36-1-391-1410, e-mail: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>) to initiate data protection authority proceedings, or you may initiate a civil action against the GVH, the Foundation and the AJBH. You are free to choose whether to bring your action before the court having jurisdiction for your domicile (permanent address) or residence (temporary address) or the court where GVH has its</p>  |

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|  | <p>registered office. You can find the court of your place of residence or stay at <a href="http://birosag.hu/ugyfelkonnnectati-portal/birosag-kereso">http://birosag.hu/ugyfelkonnnectati-portal/birosag-kereso</a>. The Budapest Capital Regional Court has jurisdiction over the case, according to the registered office of GVH.</p>   |
| <p><b>II. PROCESSING PERFORMED BY THE GVH IN THE CONTEXT OF THE ACADEMIC COMPETITION</b><br/> <i>(The GVH acts as a separate controller in relation to the processings detailed below)</i></p> |  |
| <p><b>1. CONTACT DETAILS OF THE GVH AS CONTROLLER</b></p>  | <p><b>Registered office:</b> 1054 Budapest, Alkotmány utca 5</p> <p><b>represented by:</b> Csaba Balázs Rigó, President</p> <p><b>Name of Data Protection Officer:</b> Dr. Viktória Ágnes Lechner</p> <p><b>contact details:</b> <a href="mailto:adatvedelem@gvh.hu">adatvedelem@gvh.hu</a></p>  |
| <p><b>2. PURPOSES AND LEGAL GROUNDS FOR THE PROCESSING OF PERSONAL DATA BY GVH</b></p>   | <ol style="list-style-type: none"> <li>1. Following the evaluation of the entries, GVH will contact the winning author to inform them of the outcome and that the details of the person submitting the winning entry will be published on the GVH website. The processing of data is necessary for the performance of tasks performed in the exercise of official authority vested in the GVH pursuant to Article 6(1) e) of the GDPR or in the public interest, having regard to the provisions of Article 33(4) of the GDPR. In this context, the GVH shall inform the data subject of their right to object to the processing of data for this purpose.</li> <li>2. If the students not awarded consent, their names will also be published on the GVH website to provide information about the students submitting tenders. Consent may be withdrawn at any time, without prejudice to the lawfulness of the processing prior to its withdrawal. Upon withdrawal of consent, the name of the person not awarded the prize will not be published on the GVH website.</li> <li>3. The GVH will send a copyright declaration to students who submit winning entries for the purpose of publishing their entries on the GVH website and in the Competition Review. Legal ground for the data processing Article 6(1)c) of the GDPR, taking into account Section 10(2) of Act LXXVI of 1999 on Copyright.</li> <li>4. GVH processes the personal data of winners for the purpose of accounting and transferring the payment to the winners of the Study Contest. Legal ground for the data processing pursuant to Article 6(1) c) of the GDPR in accordance with the provisions of Act CXVII of 1995 on Personal Income Tax.</li> <li>5. GVH will also request a tax advance statement and a tax eligibility certificate for the payment of the successful applicants for the expenses to be taken into account in the determination of the annual tax advance. Legal ground for the data processing pursuant to Article 6(1) c) of the GDPR in accordance with the provisions of Act CXVII of 1995 on Personal Income Tax.</li> <li>6. GVH requests applicants to submit a consultancy opinion or a review to verify compliance with the conditions set out in the call for applications. Legal ground for the data processing it is necessary for the performance of tasks performed in the exercise of official authority vested in the GVH</li> </ol> |

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|   | <p>pursuant to Article 6(1) e) of the GDPR or in the public interest, having regard to the provisions of Article 33(4) of the GDPR. In this context, the GVH shall inform the data subject of their right to object to the processing of data for this purpose.</p>   |
| <p>3. TYPE OF PERSONAL DATA PROCESSED BY GVH</p>                | <ol style="list-style-type: none"> <li>1. The data of the student who submits a winning entry will be displayed on the GVH website, which include: name, name of the university, title of the entry, amount of the prize.</li> <li>2. In the case of a not awarded person, the name of the data subject will be indicated on the GVH website.</li> <li>3. The copyright declaration will include the following personal data for the identification of the data subject: name, date and place of birth, address, mother's name.</li> <li>4. GVH will process the applicant's name, mother's name, date and place of birth, address, social security number, tax identification number and bank account number for the purpose of accounting and transferring the payment to the winners of the Study Contest.</li> <li>5. GVH will process the data on the statement or certificate, such as name, tax identification number and other data necessary to establish the tax advance base, in order to pay the winning applicants.<br/>The source of the personal data is the competent tax authority, which forwards the statement or tax eligibility certificate completed by the data subject to GVH.</li> <li>6. The personal data included in the attachment, such as name, the fact of being a student, participation in a bachelor or PhD course at university.</li> </ol> |
| <p>4. DURATION OF STORAGE OF PERSONAL DATA PROCESSED BY GVH</p> | <p>GVH will make the personal data under Subsection 1 above available on its website for 10 years, after which it will be erased.</p> <p>GVH will make the personal data referred to in Subsection 2 above available on its website until the withdrawal of the consent of the data subject or, failing that, for 10 years, after which it will erase them.</p> <p>GVH shall keep the copyright declaration referred to in Subsection 3 above for 5 years from the date on which the publication of the entries ceases.</p> <p>GVH shall keep the data processed under Subsection 4 above for 8 years.</p> <p>GVH shall keep the data processed under Subsection 5 above for 50 years.</p> <p>GVH shall keep the personal data processed under Subsection 6 above for 1 year.</p>   |
| <p>5. PROCESSORS</p>  | <p>The GVH uses the following processors during the processing of data:</p> <p><b>I. <u>NISZ Nemzeti Infokommunikációs Szolgáltató Zrt.</u></b><br/> Address: 1081 Budapest, Csokonai u. 3<br/> Postal address: 1389 Budapest, P.O. Box 133<br/> Phone: +36 (1) 459-4200<br/> E-mail: <a href="mailto:info@nisz.hu">info@nisz.hu</a></p> <p>Pursuant to Section 3 of Government Decree 466/2017 (28 December) on the Government Data Repository [hereinafter: 'Government Decree</p>  |



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|   | <p>466/2017 (28 December)'] for the security of data related to electronic administration, NISZ Zrt. is responsible as a processor for the receipt, safe and professional storage and return of data repository archives, and for the operation of the data repository archiving system. In addition, NISZ Zrt. processes the telephone number and call-related number traffic of the data subject when providing voice traffic services to the Hungarian Competition Authority (GVH) for the provision of public services within the scope of Annex 1, Section 1 of the Decree of the Minister of Interior 41/2019 (19 November) BM on the Rules for the Use of Centralised Public Infocommunication Services Provided to Budgetary Bodies Not Under the Control or Supervision of the Government.</p> <p><b>II. <u>WSH Számítástechnikai Oktató és Szolgáltató Kft.</u></b><br/> Address: 1117 Budapest, Budafoki út 97<br/> Phone: +36 1 353 9800<br/> E-mail: <a href="mailto:wsh@wsh.hu">wsh@wsh.hu</a></p> <p>WSH Kft. provides operational support for the network infrastructure of GVH.</p> |
| <p>6. RECIPIENT(S) OF THE DATA TRANSFER</p>           | <p>The duly authorised staff of the Office have access to the data contained in this Notice only for the purpose of performing their tasks and for the time and to the extent necessary for that purpose.</p> <p>GVH will transfer the data of the winner and their consultant of the law student topic “The impact of European integration on the development of consumer rights” as referred to in Section 4 to the AJBH for the purpose of the payment by the AJBH of the costs of the special prize awarded.</p> <p>With the exception set out in the previous sentence, GVH will only transfer the personal data it processes to the authority entitled to process it in cases provided for by law, for example following a lawful request by a court, prosecutor's office, investigating authority, State Audit Office, other authority or body.</p> <p>GVH will not transfer personal data contained in this Notice to third countries or international organisations.</p>  |
| <p>7. YOUR RIGHTS IN RELATION TO JOINT PROCESSING</p> | <p>You have the following rights in relation to the processings:</p> <ol style="list-style-type: none"> <li><b>1. Access rights:</b> You have the right to request information about the personal data held about you, the legal ground, purpose and duration of the processing of your personal data, the source of the personal data, to whom, when and under which law GVH has granted access to your personal data, your data subject rights and your right to lodge a complaint with a supervisory authority.</li> <li><b>2. Right to rectification:</b> If necessary, you may request the rectification of your personal data at the contact details of GVH provided in Chapter II Section 1. The Controller shall comply with the request without undue delay. The rectification of the personal data will be communicated by GVH to those to whom the personal data have been disclosed, unless</li> </ol>   |

this is impossible or involves a disproportionate effort. Upon request, GVH we will inform you of these recipients.

**3. Right to the restriction of processing:** You also have the right to request restriction of the processing of your personal data if one of the following conditions is met:

- a) you contest the accuracy of your personal data, in which case the restriction applies for the period during which GVH verifies the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the data, in which case you request the restriction of their use instead;
- c) GVH no longer requires the personal data for data processing purposes, but you request the data for the submission, enforcement or defence of legal claims;
- d) the Supervisory Authority orders it.

Should the data be subject to restriction, the personal data shall, with the exception of storage, only be processed with Your consent or for the submission, enforcement or defence of legal claims, for the protection of the rights of other natural or legal persons or for reasons of important public interest of the European Union or of a Member State. The data subject will be informed by GVH in advance of the lifting of the restriction on processing. The restriction of the personal data will be communicated by GVH to those to whom the personal data have been disclosed, unless this is impossible or involves a disproportionate effort. Upon request, GVH we will inform you of these recipients.

**4. Right to erasure (right to be forgotten):** You have the right to request the erasure of your personal data. GVH erases your personal data:

- a) if the personal data are no longer required for the purpose for which GVH collected them or otherwise processed them;
- b) when consent is withdrawn,
- c) if their processing is unlawful, or
- d) when they have to be erased for compliance with a legal obligation in Union or Member State law to which GVH is subject.

The erasure of the personal data will be communicated by GVH to those to whom the personal data have been disclosed, unless this is impossible or involves a disproportionate effort. Upon request, GVH we will inform you of these recipients.

**6. Right to objection:** You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, which is based on Article 6(1) e), including profiling based on those provisions. In such a case GVH shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the

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|                                       | <p>data subject or for the submission, enforcement or defence of legal claims.</p> <p><b>5. Right to data portability:</b> You have the right to receive your transferred personal data in a structured, commonly used format for the purpose of transferring them to a third party, if the processing is automated and based on your consent.</p> <p>Requests to exercise the above rights may be made via the contact details of GVH and will be fulfilled by GVH.</p>  |
| <p><b>8. LEGAL REMEDY OPTIONS</b></p> | <p>In addition to the above, you may submit a complaint or a request to the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11, phone: +36-1-391-1400, fax: +36-1-391-1410, e-mail: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a>) to initiate data protection authority proceedings, or you may initiate a civil action against the GVH. You are free to choose whether to bring your action before the court having jurisdiction for your domicile (permanent address) or residence (temporary address) or the court where GVH has its registered office. You can find the court of your place of residence or stay at <a href="http://birosag.hu/ugyfelkonnectati-portal/birosag-kereso">http://birosag.hu/ugyfelkonnectati-portal/birosag-kereso</a>. The Budapest Capital Regional Court has jurisdiction over the case, according to the registered office of GVH.</p> |