

DATA MANAGEMENT INFORMATION

The purpose of this Privacy Policy (hereinafter referred to as the "**Policy**") is to provide you with information about the use of **the** website <https://www.sakkpalota.hu/index.php/en> inform you, as the data controller of personal data (hereinafter referred to as "**Data Subject**"), about the data protection and data management principles, rules and regulations applied and respected by the Data Controller, the provisions of the Directive of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC - and applicable from 25 May 2018, in accordance with Article 13 of Regulation (EU) 2016/679 (hereinafter "**GDPR**").

The mission of the Data Controller is to introduce as many people as possible to the joy of playing chess, the opportunity to experience it and the development of skills, as the Chess Palace Complex Skills Development Program developed under the auspices of the Data Controller is based on providing skills development programs for young and old people in a complex way. This website has been created to promote and inform about this programme and method.

I. Identity and contact details of the Data Controller

Data Controller's name:

JPF World Szolgáltató Korlátolt Felelősségű Társaság

Data Controller's registered office, postal address:

1016 Budapest, Orom utca 20/B. Other contact details of the Data

Controller: sakkpalota@polgarjudit.com

The Data Controller

- o 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 Regulation (EC) No 95/46/EC (hereinafter "**GDPR**"), applicable from 25 May 2018,
- o for the purpose of compliance with Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: **Info.tv.**), and
- o Act V of 2013 on the Civil Code (hereinafter: **Civil Code**),
- o Act C of 2000 on Accounting (hereinafter: **Accounting Act**),
- o Act CXXVII of 2007 on Value Added Tax (hereinafter: **VAT Act**)
- o Act LXXVII of 2013 on Adult Education (hereinafter: **Fktv.**)

in the context of its activities on the website <https://www.sakkpalota.hu/index.php/en> it provides enhanced protection of the personal data of natural persons who come into contact with it and processes the personal data of Data Subjects in accordance with Article 5 of the GDPR.

The Data Controller is not obliged to appoint a Data Protection Officer pursuant to Article 37 GDPR and therefore does not employ a **Data Protection Officer**, nor is the Data Controller obliged to appoint a **representative** pursuant to Article 27 GDPR.

II. Definitions

For the purposes of this Notice:

Personal data: any information relating to an identified or identifiable natural person ("data subject"); 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.

Special categories of personal data: any data that fall within special categories of personal data, namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data revealing the identity of natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons.

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

the purposes and means are determined by Union or Member State law, the controller or the person appointed by the controller to act as controller
specific aspects may be determined by EU or national law.

Processing: the totality of processing operations carried out by a processor acting on behalf of or under the instructions of the controller.

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

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, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Recipient: the natural or legal person, public authority, agency or any other body, whether or not a third party, with whom or to which the personal data are disclosed. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing

Consent of the data subject: a voluntary, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies his or her agreement to the processing of personal data concerning him or her by means of a statement or an unambiguous act of affirmation.

Restriction of processing: blocking of stored data in order to restrict further processing of the data by marking.

Profiling: any form of automated processing of personal data in which personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Pseudonymisation: the processing of personal data in such a way that it is no longer possible to identify the natural person to whom the personal data relate without further information, provided that such further information is kept separately and technical and organisational measures are taken to ensure that no link is established between the personal data and an identified or identifiable natural person.

Destruction of personal data: the total physical destruction of the data carrier containing the data.

Data breach: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Transfer: making data available to a specified third party.

Disclosure: making the data available to anyone.

Erasure of data: rendering data unrecognisable in such a way that it is no longer possible to recover it.

Authority: the National Authority for Data Protection and Freedom of Information (NAIH)

III. Principles of data management

Personal data

- be carried out lawfully and fairly and in a transparent manner for the data subject ("**legality, fairness and transparency**");

- collected only for specified, explicit and legitimate purposes and not be processed with them in a manner inconsistent with the objectives ("**purpose limitation**"); it is not considered to be incompatible with the original purpose

further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes;

- be adequate and relevant for the purposes for which the data are processed and limited to what is necessary ("**data minimisation**");
- be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without undue delay ("**accuracy**");
- be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes ("**limited storage**");
- be carried out in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("**integrity and confidentiality**"), by implementing appropriate technical or organisational measures,
- The controller is responsible for compliance with the data management principles and must be able to demonstrate such compliance ("**accountability**").

IV. Purpose and legal basis for processing personal data

All data processing by the Data Controller falls within the scope of the GDPR, and the Data Controller will only process data processing in this way for a specific purpose and with an appropriate legal basis, as follows:

The Data Controller collects personal data directly from the Data Subject, the Data Controller shall not be liable for the accuracy or inaccuracy of the personal data, and the liability for the unlawful transmission of personal data to the Data Controller, which may not be directly from the Data Subject, shall not be transferred to the Data Controller.

The Data Controller does not collect and process special data, criminal personal data from the Data Subject.

In the case of a person under 14 years of age or otherwise incapacitated, only the Data Subject's legal representative is entitled to decide on the granting of consent to data processing, as well as on the conclusion of any contract, the registration for training courses, competitions, all on behalf of the Data Subject. The Data Controller shall pay particular attention to the processing of children's data. Any processing of data in relation to information society services offered directly to children pursuant to the legal basis of Article 6(1)(a) of the GDPR shall be lawful only if the child is at least 16 years of age. In the case of a child under the age of 16, the processing of his or her personal data is lawful only if the consent has been given by the person having parental authority over the child. Taking into account that many of the events are for children, some processing may involve children.

IV/A. Data processing at the time of registration on the website

The **purpose of the** processing under this subsection is **to** register and create a user account on the website <https://www.sakpalota.hu/index.php/en>, as a result of which the storage of the personal data provided allows the Data Controller to provide a more convenient service, to make the use of the services of the website and the application for training easier, simpler and faster, and to view previous training history.

In the event of registration on the website, the Data Controller may collect directly from the Data Subject, the following personal data.

requests and processes personal data for contact purposes for the purposes set out above:

- Last name
- First name
- E-mail address
- Username (account)
- Password (account)

Such personal data are strictly necessary for the creation of the user account, the use of its services and to facilitate and speed up subsequent applications, if the Data Subject makes use of this feature of the website.

The Data Subject is solely responsible for ensuring that the user name and password used for registration and access on the website operated by the Data Controller are not made available to unauthorised third parties.

do not communicate it to such a person, do not destroy it or lose it. The Data Controller shall not be liable if the Data Subject's user name and password or other data provided on the website are made available to an unauthorised third party, disclosed, destroyed, lost or communicated to such a person, and the Data Controller suffers direct or indirect legal damage or loss as a result.

The legal basis for processing under this subsection **is the consent of the Data Subject** pursuant to Article 6(1)(a) of the GDPR.

The Data Subject has the right to choose to give his/her consent before registration, the creation of a user account is not a prerequisite for using the services of the website or for registering for training courses, it is a convenience only. This consent is voluntary and not a prerequisite for the conclusion of a contract.

The consent given by the Data Subject during registration **may be withdrawn at any time**, and the user account may be deleted at any time. The Data Subject may withdraw his or her consent by using the facility provided for this purpose on the website, or by sending a statement to the Data Controller by post or by electronic means to one of the above contact details of the Data Controller.

In the event of withdrawal of consent, the Data Controller shall delete the Data Subject's user account and all personal data provided by the Data Subject immediately upon receipt of the request. Withdrawal of consent shall not affect the lawfulness of the processing based on consent prior to its withdrawal.

The Data Controller **shall store** the personal data until the Data Subject's consent is withdrawn. However, if the Data Subject's user account is inactive (no login) for 1 year after registration, it will be deleted 1 year after registration.

IV/B. Processing of data relating to applications for training

The purpose of the processing of data under this subsection is to enable the Data Subjects to apply online through the website <https://www.sakkpalota.hu/index.php/en> for the training courses indicated therein by filling in a registration form, to participate in the training, to receive a certificate of completion of the training and to complete the training. The training courses are accredited training courses registered in the adult education system, in which case certain personal data are processed by the Data Controller in order to fulfil its legal obligations. It is only possible to apply for training online.

The Data Controller processes the following personal data directly from the Data Subject when filling in the application form for training courses in order to fulfil its legal obligation pursuant to Article 21 (1) of the Act on the Protection of Personal Data:

- Last name
- First name
- Name at birth
- Place and date of birth
- Mother's name
- E-mail address
- School education
- Indication of training already completed, serial number of certificate issued
- Indication of the training to be given

Such personal data are strictly necessary to enable the Data Subject to join and participate in the training courses advertised on the website and to enable the Data Controller to carry out the training courses.

The legal basis for the above processing is the **fulfilment of a legal obligation** incumbent on the Data Controller pursuant to Article 6(1)(c) of the GDPR.

The Data Controller **shall store** the personal data for 8 years from the conclusion of the adult education contract (Art.21 (5) Fktv.).

The Data Controller processes additional personal data provided directly by the Data Subject when filling in the application form for training courses for the purpose of fulfilling the adult education contract concluded with the Data Subject and thus for the purpose of conducting the training:

- Address

- Phone number
- Bank account number (IBAN) and bank transaction details (in the case of training fees paid directly by the natural person concerned by bank transfer, name of the transferor, name of the bank holding the account, content of the transaction, date, serial number)

Such personal data is strictly necessary for the purposes of contacting the Data Subject and for the purposes of the to fulfil an adult learning contract.

The legal basis for the above processing is Article 6 (1) (b) of the GDPR, i.e. **the performance of a contract** in which the

Both the Data Controller and the Data Subject are parties.

The Data Controller **stores** the personal data until the end of the adult education contract.

The Data Controller may, in the case of completion of the application form for training courses, directly from the Data Subject, further

process personal data for the purposes of the training:

- Content of comment on form
- Content of the cover letter
- Work details (employer's name, contact details)

Such personal data may help to ensure that the Data Subject receives the widest possible range of personalised services during the training and that the controller is aware of the schools in which its method is used. The motivation letter may help the Data Controller to assess the composition of the training and to compose a group of participants to which the Data Controller can adapt the training material, thus facilitating the smooth and adequate delivery of the training. The workplace data provide the Controller with feedback on the institutions where the Controller's methodology is used and trained, but these data are stored by the Controller as non-personal data, in a way that cannot be linked to the Data Subject, after the training has been completed.

The legal basis for processing under this subsection **is the consent of the Data Subject** pursuant to Article 6(1)(a) of the GDPR.

The Data Subject has the right to decide whether to give his or her consent prior to enrolment, the provision of personal data is not a prerequisite for participation in the training or for the Data Subject to enrol in any other way than through the online interface, the Data Subject shall not be disadvantaged, and registration may be made in several forms. This consent is voluntary and not a precondition for the conclusion of any contract.

The consent given by the Data Subject during the application process **can be withdrawn at any time**, thus the data provided can be deleted at any time, and does not prevent the completion of the training. The Data Subject may withdraw consent by sending a statement to the Data Controller by post or electronically, or by contacting the Data Controller in person at one of the above contact details.

In case of withdrawal of consent, the Data Controller shall delete all personal data provided by the Data Subject from its database immediately upon receipt of the request. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

The Data Controller shall keep the personal data until the Data Subject's consent is withdrawn, but no later than the end of the training.

store.

IV/C. Processing of data in connection with invoicing

The **purpose of** the processing of data under this subsection **is to** fulfil the Data Controller's obligation to invoice the training fee paid for the training courses through the website <https://www.sakkpalota.hu/index.php/en/>, on the basis of which the Data Controller is obliged to process the following personal data of the Data Subject:

- Last name
- First name
- Billing address
- Tax identification number

This processing applies to Data Subjects if they pay all or part of the training fee personally and not through an institution/provider. Where an institution/maintainer pays all or part of the training fee on behalf of the Data Subject, the Data Subject is required to provide the name, address and tax number of the institution/maintainer and the part of the training fee paid by the institution/maintainer for billing purposes, but this is not personal data.

The legal basis for the processing of data under this subsection is Article 6 (1) (c) of the GDPR, the **fulfilment of the legal obligation** incumbent on the Data Controller pursuant to the Invoice Act and Section 159 (1) of the VAT Act. The provision of the above personal data by the Data Subject is mandatory for the application for training, otherwise the application will not be accepted. The Data Subject is responsible for the accuracy of the personal data provided.

The Data Controller **shall store** the personal data for 8 years after the invoice is issued (Article 169 (1)-(2) of the Invoice Act).

IV/D. **Processing of data relating to the taking and publication of photographs and videos during training courses**

The Data Controller informs the Data Subjects that the **purpose of the** processing of data under this subsection is to promote the training by publishing photos and videos of the training on the website <https://www.polgarjuditmodszer.hu/> and on social media platforms (Facebook, Instagram, Twitter, Youtube channel) and to disseminate the method to as many educational institutions as possible in order to improve education.

The Data Controller maintains its social networking pages for the purpose of promoting events and training. The Data Controller is not responsible for any unlawful content or comments posted by users of the community site, nor is it responsible for any errors, malfunctions or problems resulting from changes in the operation of the community site. In other respects, the data processing rules of the social networking sites shall govern the processing of personal data posted there.

The Controller requests and processes the following personal data for the purposes set out above:

- Photograph, likeness of the person concerned
- Video footage of the affected person

The video recording of the Data Subject captures and stores live images and sound at the time of recording, but at the time of publication it only transmits video images, usually edited together, in the form of a small promotional film, highlights film, which serves to present and describe the method, training or programme in an objective, professional and descriptive manner. The footage in the video is used solely for the purpose of colouring the video and interpreting the method.

The legal basis for processing under this subsection **is the consent of the Data Subject** pursuant to Article 6(1)(a) of the GDPR.

The Data Subject has the right to decide whether to give his or her consent prior to the taking of both photographs and video recordings. This consent is voluntary, is not a prerequisite for participation in the training, shall not be to the detriment of the data subject and is not a precondition for the conclusion of any contract.

The consent given by the Data Subject during the application process **may be withdrawn at any time**, and the photographs and video recordings may be deleted. The Data Subject may withdraw consent at any time by sending a statement to the Data Controller by post or electronically, or by contacting the Data Controller in person at one of the above contact details.

In case of withdrawal of consent, the Data Controller shall delete all personal data provided by the Data Subject from its database immediately upon receipt of the request. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

The Data Controller shall keep the personal data until the withdrawal of the Data Subject's consent, but no later than the next until the same event takes place.

IV/E. **Contact via the website**

The purpose of the processing under this subsection is for the Data Subject to contact the Data Controller directly

through the website <https://www.sakkpalota.hu/index.php/en>. The "contact us" function on the website is designed to facilitate and expedite communication with the Controller, allowing visitors to the website to enquire about any event and to ask the Controller any questions.

In connection with the above activities, the Data Controller requests the following personal data directly from the Data Subject and for the purposes set out above:

- Name
- E-mail address
- Content and date of the request

Such personal data is strictly necessary to enable the Data Controller to provide an adequate and complete response to the Data Subject's questions and enquiries and to facilitate communication with the Data Subject.

The legal basis for processing under this subsection **is the consent of the Data Subject** pursuant to Article 6(1)(a) of the GDPR.

The Data Subject has the right to opt-in before contacting the website, which is not a prerequisite for the use of the website.

to use your additional service. This consent is voluntary and not a precondition for entering into a contract.

The consent given by the Data Subject **may be withdrawn at any time**. The Data Subject may withdraw his or her consent at any time by using the same interface where he or she contacted the Controller or by sending a statement to the Controller by post or by electronic means to one of the above contact details of the Controller.

In the event of withdrawal of consent, the Data Controller shall delete all personal data provided by the Data Subject at the time of contact immediately upon receipt of the request. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

The Data Controller **shall store** the personal data until the Data Subject's consent is withdrawn, but at the latest until the end of the correspondence following the contact.

VI/F. Data management of satisfaction questionnaires

The purpose of the processing of data under this subsection is **to** enable the controller to assess the satisfaction and feedback of training participants on the training courses advertised on the website <https://www.polgarjuditmodszer.hu/>, which questionnaires are also shared anonymously on the website. Based on the feedback, the controller can improve and refine its training courses and strive to provide a better service.

In connection with the above activities, the Data Controller requests the following personal data directly from the Data Subject and for the purposes set out above:

- Name (optional)
- Content of the questionnaire, stakeholder opinion

It is up to the data subject to decide whether to fill in the questionnaire anonymously or by providing his/her name. Completion of the questionnaire is optional and the provision of the name is not compulsory, it is based on the data subject's voluntary choice. Paper questionnaires are always completed anonymously, in the case of online and blended training, the data subject can decide whether he/she wishes to complete the survey anonymously. Where the data subject consents to the inclusion of his or her name, this will be done only towards the controller, but the controller will not publicly publish the data subject's name on its website in relation to the questionnaire.

The legal basis for processing under this subsection **is the consent of the Data Subject** pursuant to Article 6(1)(a) of the GDPR.

The Data Subject has the right to give his or her consent to the inclusion of his or her name before completing the questionnaire, which is not a prerequisite for completing the questionnaire and does not affect participation in the training. This consent is voluntary and not a precondition for the conclusion of a contract.

The consent given by the Data Subject **may be withdrawn at any time**. The Data Subject may withdraw his or her consent at any time by sending a postal or electronic notice to the Data Controller at one of the above contact details of the Data Controller.

In the event of withdrawal of consent, the Data Controller shall delete the personal data of the Data Subject

provided in relation to the questionnaire and anonymise the questionnaire immediately upon receipt of the request. The questionnaire will then be will not be linked in any way to a personal data subject. The withdrawal of consent shall not affect the the lawfulness of processing based on consent before its withdrawal.

The Data Controller **shall store** the personal data until the Data Subject's consent is withdrawn.

IV/G. **Processing of data relating to online visitors**

The primary **purpose of the** processing of data under this subsection is to make the services provided by the website more efficient, secure and personalised to the needs of the visitor, and to correct any errors reported during the use of the website.

The website managed by the data controller uses cookies to store and process data on the visitor's terminal equipment as soon as the website is visited. In any case, the data subject must give his or her consent to the use of cookies by activating the icon "This website uses cookies" displayed on the website.

The Data Subject's consent to the use of cookies is not required in order to visit the website, however, without consent, the website or certain sub-pages of the website may not function properly or the website may refuse to allow the Data Subject access to certain data.

By using cookies, the data controller processes the following data through its website:

- a. some of the data on the visitor's device that enables the open network connection to the website,
- b. IP address used by the visitor,
- c. page settings
- d. login status, fact of visit, time of visit

The sole purpose of processing this data is to enable the Data Controller to obtain data on website visits, to detect and log any errors or attempted attacks on the website and to provide services more efficiently and in line with the needs of the visitor.

The legal basis for processing under this subsection **is the consent of the Data Subject** pursuant to Article 6(1)(a) of the GDPR.

The consent given by the Data Subject **may be withdrawn at any time**. The Data Subject can delete cookies and visit history by deleting the browsing data or request to refuse cookies in case of a new visit. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.

The Data Controller **shall store** the personal data until the Data Subject's consent is withdrawn.

V. Fact of automated decision-making, profiling

The Data Controller does not process personal data by automated decision-making or profiling, nor does it applied.

VI. Data transmission, recipients

The Data Controller does not transfer personal data to third countries or international organisations outside the European Union in accordance with Articles 44-49 of the GDPR.

The Data Controller transfers your personal data to the following recipients:

- To the Data Controller's respective appointed accountant, as data processor, in relation to billing data for the purposes of billing and accounting, for compliance with legal obligations (Article 6(1)(c) GDPR),
- The billing software provider used by the Data Controller at any given time as a data processor for the we transmit billing data for the purpose of fulfilling a billing obligation (Article 6(1)(c) GPDR),
- Upon payment of the training fee, if the Data Subject wishes to pay by bank transfer, the payment data (bank account and bank details) will be transmitted to the Data Controller's bank (OTP Bank Nyrt.) for the purpose of the transaction to be booked and recorded (Article 6 (1) (b) GPDR),
- In case of publishing on social media (images and videos) Facebook, Youtube, Instagram, Twitter, but only for publication and storage purposes (Article 6(1)(a) GDPR),

- The Data Controller shall provide data on the Data Subject's natural person identification data, electronic mail address and highest educational qualification to the adult education state administration body (Pest County Government Office - Adult Education Data Service System (FAR)) in the adult education data service system (Article 15 (1) paragraph of the Adult Education Data Service Act),
- The Data Controller is obliged to provide data to the court, the prosecutor, the infringement authority, the administrative authority, the investigative authority or other bodies (NAV) on the basis of the law for the purpose of providing information, communicating data, transferring data or making documents available. In this context, the provision of data is only to the extent that is strictly necessary to achieve the purpose of the authority ordering the provision of data - provided that the authority has specified the exact scope of the data and the exact purpose. The controller shall not be held liable for the performance of such transfers and the consequences thereof, if any, and no claims may be made against it. Such transfers may be made on a case-by-case basis by legal authorisation (Article 6(1)(c) GDPR).

The Data Controller is not responsible for the data management of the Community Sites. The privacy notice of the Community Sites can be found at the following locations:

Facebook: <https://www.facebook.com/privacy/policy>

Instagram: <https://privacycenter.instagram.com/policy?fbclid=IwAR10Wo1dN0HuetXQxB8ETFWjoYLtBCbPxqyRXkZowni0IKEz1qRQ2cM2NsE>

Youtube: <https://support.google.com/youtube/answer/10364219?hl=hu>

Twitter: <https://twitter.com/hu/privacy>

The data controller uses a data processor for the purpose of taking photographs and video recordings, and therefore the images are recorded and stored by the photographer attending the training sessions.

The hosting and database of the website operated by the Data Controller is provided by an external contractor as a data processor, who only provides storage services for the data, registrations and visits recorded on the website:

Operator:	Servergarden Ltd.
Company registration number:	Cg.01-09-350297
Seat:	1139 Budapest, Váci út 99-105. 3rd em.

Privacy notice:

https://api.servergarden.hu/uploads/files/Dokumentumok/Servergarden_Adatkezelesi_Tajekoztato_20220204.pdf

The domain provider of the website operated by the data controller as data processor:

Operator:	Mediacenter Hungary Kft.
Company registration number:	Cg.03-09-114492
Seat:	6000 Kecskemét, Erkel Ferenc utca 5.

Privacy notice: https://www.mediacenter.hu/doc/adatvedelmi_szabalyzat.pdf

The online games on the website are not operated and developed by the data controller, their interfaces are open, they can be used by anyone, and as a rule, no history is kept. The Controller does not process any personal data in connection with the games, nor does it process any personal data under its auspices in the event of the creation of a registration account.

The games are provided by the LearningApps and Chesskid platforms, which have separate privacy policies, independent of the data controller, through a separate data controller. The data controller is not responsible for the processing of personal data on these sites and does not transmit data to them. The privacy notices of the websites are available on the interface below:

LearningApps: <https://learningapps.org/rechtliches.php>

ChessKid: <https://www.chesskid.com/legal#privacypolicy>

The controller does not transfer data in other respects or may do so only with the explicit consent of the data subject.

VII. Data security

The Data Controller shall in all cases comply with the principles set out in Article 5 of the GDPR in the processing of personal data.

The Data Controller shall ensure that, when processing and storing personal data electronically and when transmitting personal data, it takes all the technical and organisational measures necessary to ensure that the Data Controller can choose the technical solution for the processing of personal data that guarantees a higher level of protection of personal data at the current state of the art.

The Data Controller shall, taking into account the state of science and technology and the cost of implementation, 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, implement appropriate technical and organisational measures to ensure a level of data security appropriate to the level of risk, including:

- 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.

The Data Controller shall delete from all its records personal data whose holder has ceased to have a legal relationship with the Data Controller for any reason and the period of processing has expired, unless the retention of the personal data is required by law.

In the event of an incident resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed (hereinafter "Data Breach"), the Data Controller undertakes to notify the National Authority for Data Protection and Information Security as the competent supervisory authority without delay and, if possible, no later than 72 hours after becoming aware of the Data Breach. An exception to the obligation to notify shall be made if the personal data breach is unlikely to pose a risk to the rights and freedoms of natural persons. Where the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, without undue delay, inform the data subject of the personal data breach, in which the data subject shall be informed in a clear and plain language of the nature of the personal data breach.

VIII. The rights of the holder of personal data

Natural persons whose personal data are processed by the Controller have the following rights with regard to the processing of their personal data by the Controller:

- a. right to information (Articles 13-14 GDPR);
- b. right of access (Article 15 GDPR)
- c. right to rectification (Article 16 GDPR)
- d. right to erasure (Article 17 GDPR)
- e. the right to restriction of processing (Article 18 GDPR)
- f. right to data portability (Article 20 GDPR)
- g. right to object (Article 21 GDPR)

a. Right to information

Taking into account that the controller collects personal data directly from the Data Subject, it fulfils its obligation to provide information in accordance with Article 13 of the GDPR by means of this Privacy Notice. The Controller does not collect personal data from any other source than the Data Subject.

b. Right of access

The data subject has the right to request information and confirmation that his or her personal data has been processed. The Data Controller is obliged to provide such information, including access to the information referred to in Article 15 of the GDPR.

c. Right to rectification

If the Data Controller inaccurately or incompletely processes personal data of the holder of the personal data, the data subject may request the Data Controller to correct the inaccurately processed personal data without undue delay or to complete the incompletely processed personal data without undue delay on the basis of the data provided and verified by the data controller.

d. Right to erasure (right to be forgotten)

The data subject shall have the right to obtain from the controller, upon his or her request, the erasure of personal data relating to him or her without delay, if one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise were treated,
- the data subject withdraws the consent on which the processing is based and there is no other basis for the processing legal basis,
- the data subject objects to the processing, there is no overriding legitimate ground for the processing.
- the personal data have been unlawfully processed,
- the personal data are processed in accordance with the legal requirements applicable to the controller under Union or Member State law must be deleted in order to fulfil the obligation,
- collect personal data by offering information society services took place in connection with

The Data Controller informs the Data Subjects that a request for erasure or for the exercise of the right to be forgotten may not be must comply with it, if the processing is necessary:

- to exercise the right to freedom of expression and information,
- fulfil an obligation to process personal data or exercise official authority
- in the exercise of its functions,
- on grounds of public interest in the field of public health,
- for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes,
- to bring, enforce or defend legal claims.

e. Right to restriction of processing

The data controller has the right to request the Data Controller to process personal data concerning him or her. limits, if:

- the data controller contests the accuracy of the personal data collected and stored by the controller, for a period of time relevant to the verification of the accuracy of those data; or
- The processing carried out by the controller is unlawful and the controller of the personal data collected and stored by the controller is objects to the erasure of your personal data; or
- the purpose of the processing has ceased and the Data Controller no longer needs the personal data collected and stored, but the data controller requests the continued (limited) processing in order to establish, exercise or defend a legal claim; or
- the data subject exercises his or her right to object, the examination of the lawfulness of the right to object for

f. Right to data portability

The data subject shall have the right to obtain the personal data relating to him or her which he or she has made available to a controller.

data, in a structured, widely used, machine-readable format, if

- the processing is based on consent within the meaning of Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR, or on a contract within the meaning of Article 6(1)(b) of the GDPR; and
- the processing is carried out by automated means.

In exercising his or her right to data portability, the data subject shall have the right, where technically feasible, to obtain.

feasible, request the direct transfer of personal data between data controllers.

g. Right to object

The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data, including profiling based on the aforementioned provisions, in relation to processing based on the legitimate interests of the Controller. In such a case, the controller may no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override interests, rights and freedoms of the data subject or which are related to the establishment, exercise or defence of legal claims. Where personal data is processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.

The data controller may exercise the rights set out in this Chapter, in the case of the rights set out in points (f) and (g), if the conditions for the exercise of the rights are met for the processing in question, at any time by submitting a request to the controller. The data controller may submit his or her request electronically, on paper by using the universal postal service or on paper at the controller's head office to a manager, employee or other person authorised to represent the controller. The Controller shall provide the information on the processing of personal data and on the exercise of rights without undue delay and free of charge in the form in which the request was made, but no later than 1 month from the request.

IX. Remedies

If the personal data owner finds that the Data Controller is in breach of the data protection legislation in relation to the processing of his or her personal data, he or she may apply to the competent **court or the National Authority for Data Protection and Freedom of Information** for redress in order to protect his or her rights.

National Authority for Data Protection and Freedom of Information

Head office: 1055 Budapest, Falk Miksa u. 9-11.

Postal address: 1363 Budapest, PO Box 9.

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Electronic contact: ugyfelszolgalat@naih.hu Website: <http://naih.hu>

The Data Controller shall publish the current Data Processing Notice on **its website in** electronic form. If the Data Subject makes a request to that effect, either electronically or on paper, the Controller shall send the Privacy Notice as an attachment to an electronic mail to the electronic mail address provided by the Data Subject.

The Data Controller reserves the right to unilaterally amend this Privacy Notice, in particular if required by changes in legislation, official practice or other external circumstances. The Data Controller shall notify the Data Subject of any such changes and shall, upon the Data Subject's request, provide the Data Controller with the content of the current Privacy Notice.