

Data management information for our partners



**HUNGARIAN
CONVENTION
BUREAU**



Based on Regulation **GDPR (General Data Protection Regulation)** (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 *on the protection of individuals with regard to the processing of personal data and on the free movement of such data natural persons have **rights** with regard to the possession of their **personal data**, so we perform and **regulate their data management activities much more transparently and comprehensively than before.***

The purpose of this *Privacy Notice* is to provide you with **adequate and detailed information about our processing of your personal data.**

Our *Privacy Notice* contains **mandatory and recommended** information specified in **Articles 13 and 14** of the **GDPR Regulation**, and in accordance with **Article 12 of the GDPR**, *we have prepared it in a concise and understandable form in a tabular, transparent form.*

We will give you the opportunity to learn in the most credible manner the most important requirements and rights imposed by Regulation (EU) 2016/679 of the European Parliament and of the Council *on the basis of the original text* of the regulation. Based on the following requirements, we have prepared **our Privacy Policy** and we have developed and operate **our entire data management system**, so this **notice** does not contain further details of the regulation, so we will help you with the instructions below to **determine the exact** in order to provide information.



Requirement	Privacy Policy
GDPR Article 4 Definition of the concepts used in our data management	Chapter 1.4
GDPR Article 5 <u>Requirements</u> for the principles of processing personal data	Chapter 2.1
GDPR Article 6 <u>Requirements</u> regarding the legality of our data processing	Chapter 2.2
GDPR Article 7 <u>Requirements</u> for managing your consent	Chapter 2.2.1
GDPR Article 8 <u>Requirements</u> for data processing of children data under 16 years of age	Chapter 2.3
GDPR Article 9 <u>Requirements</u> for the processing of personal data classified as a special category of personal data	Chapter 3.1
GDPR Article 12 <u>Requirements</u> for your rights and the fulfilment of your rights	Chapter 5
GDPR Articles 13 and 14 <u>Requirements</u> for your information	Chapter 5.1
GDPR Articles 24 and 29 <u>Requirements</u> for our controller and/or processing activities	Chapter 7.3
GDPR Article 30 <u>Requirements</u> for the recording of our data processing activities	Chapter 10
GDPR Article 31 <u>Requirements</u> for the security of our processing activities	Chapter 9
GDPR Articles 33 and 34 <u>Requirements</u> for handling data breaches	Chapter 8
GDPR Articles 35 and 36 <u>Requirements</u> for the preparation of our data protection impact assessments	Chapter 11
GDPR Articles 37 to 39 <u>Requirements</u> for the Data Protection Officer	Chapter 12
GDPR Articles 44 to 49 <u>Requirements</u> for the transfer of personal data to third countries or international organisations	Chapter 7.2



Summary information on the rights of the data subject (art. 13 2/b GDPR)

We provide you with **credible information** based on the *original text of the regulation* about your **rights** and their **enforcing possibilities**, which you can also see in detail **in our *Privacy Policy***. You have the right to be informed of the facts and information related to data processing prior to the initiation of data processing.

GDPR Article 15 Your right to access your personal data. You have the right to receive feedback from the Controller as to whether your personal data are being processed and, if such processing is in progress, you have the right to obtain access to personal data and related information specified in the Regulation.	Chapter 5.2.
GDPR Article 16 Your right to rectify your personal data. You have the right to make the Controller rectify inaccurate personal data concerning you without undue delay. Taking into account the purpose of the data management, the data subject shall have the right to request the completion of incomplete personal data, including by means of a supplementary statement.	Chapter 5.4.
GDPR Article 17 Your right to delete your personal data. You have the right to ask our Company to delete personal data concerning you without undue delay at your request, and the data controller is obliged to delete the personal data concerning the data subject without undue delay if any of the reasons specified in the Regulation exist:	Chapter 5.3.
GDPR Article 18 Your right to restrict the processing of your personal data. You have the right to ask the Controller to restrict the processing of data if the conditions specified in the Regulation are met.	Chapter 5.5.
GDPR Article 20 Your right to data portability of your personal data. You have the right to receive personal data relating to you by the Controller in a structured, widely used, machine-readable format, and you have the right to transfer such data to another Controller without being hampered by the Controller to which the personal data have been provided.	Chapter 5.6.
GDPR Article 21 Your right to object . You have the right to object to your personal data at any time under Article 6 (1) (e) of the GDPR Regulation for reasons relating to your own situation (data processing is in the public interest or within the framework of the exercise of a public authority conferred on the Controller, or the processing is necessary for the purposes of enforcing the legitimate interests of the Controller or a third party).	Chapter 5.7.



Összefoglaló tájékoztatás az érintett jogaival kapcsolatban (GDPR 13. cikk 2/b)	
GDPR Article 22 The right to object and automated decision-making in individual cases. You have the right to object at any time to the processing of your personal data based on Article 6 (1) (e) or (f) for reasons relating to your situation, including profiling based on those provisions. You have the right not to be subject to a decision based solely on automated data processing, including profiling, which would have legal effects on you or would similarly significantly affect you.	Chapter 5.8.
GDPR Article 34 Your right to inform you in connection with personal data management incidents .	Chapter 5.9.

You can download and view the GDPR Regulation at the following links:

- https://www.naih.hu/files/CELEX_32016R0679_HU_TXT.pdf
- <http://eur-lex.europa.eu/legal-content/HU/TXT/HTML/?uri=CELEX:32016R0679&from=EN>

You can find our Privacy Policy on our WEBSITE in the Footer Menu.

If any circumstances of data processing change, this “Privacy Notice” will be reviewed and, if necessary, modified and published in accordance with GDPR requirements in the shortest possible time. Please read the current “Privacy Notice” carefully in all cases, because they contain important information about the processing of your personal data.

In order to ensure the security of your data, we have developed a comprehensive system of rules and procedures. Compliance with these is mandatory for all employees carrying out data processing. Our policies are listed in “Annex 1 to our Privacy Policy”, which we have made available to you.

With regard to **information security** and **data protection**, our Company has taken all necessary steps. The **physical and logical protection** of the devices is ensured, and **access** is sufficiently **limited** according to our strict eligibility procedures.



As a Controller, we will do our best with respect to the personal data we process to **ensure confidentiality, integrity and availability** of your personal data.

We will proceed in accordance with the GDPR Regulation in relation to possible **data breaches**. If the personal data breach is likely to entail a **high risk**, we will notify it to the **supervisory authority within 72 hours** of the acquisition of knowledge and **inform the data subjects** in the **cases specified** by the regulation.

Enforcement forms

1. Request for access
2. Request for rectification
3. Restriction of data processing request
4. Request for data portability
5. Application for objection
6. Request for cancellation
7. Request for withdrawal of consent

You can download the required enforcement form from our WEBSITE under the menu item Privacy Policy.

Please note that if you **do not provide us with your own data as data controller**, but with of another natural person, in this case, it is **your sole responsibility** to provide the data with the consent, knowledge and proper information of that natural person. We are not obliged to investigate the existence of these **as controllers!**

As Controller, we verify the authenticity of the personal data received only in cases where its obligation is imposed by the relevant legal regulations, in all other cases **our responsibility for the authenticity and accuracy of the data provided** is being excluded.

Please note that if you do not comply **with this obligation and therefore the data subject makes a claim against us as a controller**, we may pass on the claimed claim and the amount of any related damage to you **as a controller!**

Please be informed that personal data may be transferred to controlling bodies if necessary or for verification purposes, with a duly reduced data content, and data may also be transferred individually in order to exercise certain legal rights and obligations in unspecified cases, in order to **fulfil our legal obligation**.



Information	The publisher of this “Privacy Notice” is also the data management organisation . Data management is carried out by employees of our organization. On our part, your data is only accessible to those of our employees who are absolutely necessary to carry out their work. Access rights to your personal data are set out in strict internal policies.
Company name:	Hungarian Congress Bureau Nonprofit Ltd.
Registered seat:	H-1011 Budapest, Szilágyi Dezső tér 1
Company registration No.:	01-09-354490
Contact:	hcb@hcb.hu
Location of data processing:	www.budcb.hu

Data controller’s data protection responsible(art. 13 1/a GDPR)	
Information	You can contact the data protection responsible of our organization with questions, complaints or exercise of your rights . After ineffective consultation, you can apply for redress or a complaint to the Supervisory Authority as mentioned below.
Name:	Noémi Mátray
Contact:	noemi.matray@hcb.hu



Data protection officer (art. 13 1/b GDPR)	
Information	Pursuant to Article 37 GDPR, after the review, we found that our organization does not need to appoint a “Data Protection Officer”.
Name:	–
Contact:	–

Supervisory authority (art. 13 2/d GDPR)	
Information	If you have been violated in connection with our processing, you have the right to lodge a complaint with the following competent Supervisory Authority . Right to complain to a supervisory authority (ART. 77 GDPR); Right to an effective judicial remedy against a supervisory authority (ART. 78 GDPR)
Supervisory Authority:	National Data Protection and Freedom of Information Authority
Registered seat:	1055 Budapest, Falk Miksa utca 9-11.
Website:	www.naih.hu Online administration: www.online.naih.hu/EMS/Home
E-mail:	ugyfelszolgalat@naih.hu
Phone number:	+36 (1) 391-1400
Address:	1024 Budapest, Szilágyi Erzsébet fasor 22/C.9
Postal address:	1363 Budapest, Pf.: 9.



Competent court (GDPR Art. 79)	
Information	In addition, you may bring an action against our organisation in the event of a breach of the protection of personal data before the Regional Court, which is competent in the territory of the General Court. The data subject has the right to an effective judicial remedy against the controller or the processor if he considers that his rights under the GDPR have been infringed as a result of improper processing of his personal data.
Competent General Court:	Metropolitan Tribunal
Phone number:	+36 (1) 354-6000
Address:	1055 Budapest, Markó utca 27.
Postal address:	1363 Budapest, Pf. 16.

Applicable legislation	
As data controllers, we apply the following laws and regulations in the case of processing based on Article 6 (1) (c) when processing is necessary for the fulfilment of the legal obligation of the controller.	
2000_C	Act C of 2000 on Accounting,
Act CL of 2017	on the rules of taxation
GDPR_2016_679	GDPR Regulation
Act CXXXIII of 2005	on the rules of the conduct of private investigators
Act CLIX of 2012	on postal services
Act XXXIV of 2019	On amendments to the laws necessary to implement the data protection reform of the European Union



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42 – Processing of data in connection with the management of contracts and invoices
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41 – Registration and communication management of partners’ personal data	
GDPR Article 13 1/C The purpose of data processing:	When concluding a contract with partners, manage the data of the contractor and the contact persons designated by them and keep them up to date. Register of registered and returned postal items related to the activities of the data controller, as well as items sent with other service providers.
GDPR Article 13 1/C Legal basis of data processing:	<ul style="list-style-type: none"> • legitimate interest (6./f) • contract performance (6./b)
Scope of data subjects :	partners and their contacts
GDPR Art. 14 1/D Scope and category of personal data processed by the controller	<ul style="list-style-type: none"> · name · email address · phone number · postal address
Description of the processing activity	<p>We keep in touch with the contracting partners during the performance of the contract. Personal data is the contact data provided by the contracting party, which is processed in our registers, mail systems and contact lists of our telephones.</p> <p>If the partner or the data subject directly indicates to us that the relationship between the two entities has ceased, or that the contact information has changed, we will modify or delete the personal contact information attached to the partner without any enforcement form.</p>



41 – Registration and communication management of partners’ personal data	
(if any) Recipients and categories of recipients of personal data (Article 13 1/E)	• A2: IT Operation
(if any) In the case of processing based on Article 6 (1) (f), a description of the legitimate interests of the controller or third party (Article 13 1/D)	<p>The legitimate interest of our organization is to manage the contact details of our partners, to keep records in the course of the concluded contracts, and the name and <u>postal address are essential information for postal delivery.</u></p> <p>Contact information will be shared with the staff to whom it is necessary.</p> <p>Contact information is handled by our organization for legitimate interests.</p> <p>Based on the principle of data saving, we use only as much contact data (name, email address, phone number, postal address) that is necessary to achieve the goal.</p> <p>In external communication, we only manage the contact details of those stakeholders for whom this is essential in the course of the contract and service.</p> <p>On the basis of the foregoing, it can be concluded that the legitimate interest of the controller, pursued by the unconditional application of the principles of data conservation and purpose limitation, takes precedence over the related interests, rights and freedoms of data subjects.</p>
Duration of storage of the processed data or criteria for determining that period (Article 13 2/A)	contact data: pending a positive objection or explicit request of the contractor or the data subject (regarding data deletion, data modification)
Determination of the data source where data are not derived from data subjects (Art. 14 2/F GDPR)	The listed partner data will not be transferred to any third country.
(if any) The fact that the controller intends to transfer personal data to a third country or to an international organisation . (Article 13 1/F)	The listed partner data will not be transferred to any third country.



41 – Registration and communication management of partners’ personal data	
<p>Consequences of the obligation to provide data and the consequences of failure to provide it (Article 13 2/E)</p>	<p>Our company manages the contact data along the concluded contract for the purpose of proper communication, failing to do so may jeopardise the performance of the contract. Our organization only needs the amount of data by which the appropriate communication is ensured. It is the voluntary decision of the partner.</p> <p>In the event of postage, the exact address guarantees that our mail and shipment will arrive at the right place.</p> <p>In case of inaccuracy, the shipment does not arrive at the recipient.</p>
<p>Automated decision-making (profiling). Information on the logic used, as well as the consequence of the activity on the data subject. (Article 13 2/F)</p>	<p>none</p>
<p>Other information</p>	<p>If you, as the contractor or its agent or employee, change or delete data, please notify us.</p> <p>If the partner notifies us of its intention to delete / modify it for any reason, we will endeavor to have the saved information deleted / modified from all systems.</p>

42 – Data management related to the management of contracts and accounts	
<p>GDPR Article 13 1/C The purpose of data processing:</p>	<p>Data processing for the purpose of fulfilling tax and accounting obligations. The Company manages the data of natural persons who enter into business relations with it as a customer or supplier for the purpose of fulfilling legal and tax obligations (accounting, taxation) as defined per law.</p> <p>The filing of contracts related to the activities of the controller, processing the data of the contractor and their agents at the time of the conclusion of the contract and keeping them ready.</p> <p>Issuing an invoice and issuing the related mandatory documentation for the performance of the service.</p>
<p>GDPR Article 13 1/C Legal basis of data processing:</p>	<ul style="list-style-type: none"> • fulfilment of a legal obligation (6./c) • on consent (6./a)
<p>Scope of data subjects:</p>	<p>partners and their contacts</p>



42 – Data management related to the management of contracts and accounts	
<p>GDPR Art. 14 1/D Scope and category of personal data processed by the controller</p>	<p>Legal obligation (mandatory)</p> <ul style="list-style-type: none"> · name · signature · contact information (email address, telephone number, postal address) · bank account number: · in the case of an individual: other personal identification data <p>Other personal data included in the contract</p> <p>On consent (optional)</p> <ul style="list-style-type: none"> · Any other personal data provided that is not required by law for billing, but voluntarily entered on the invoice by the partner.
<p>Description of the processing activity</p>	<p>We will always draw up a contract with the contracting partners to comply with the law. These are handled in accordance with our Rules of Recording and internal operating procedures.</p> <p>Our incoming and outgoing invoices are handled and filed in accordance with legal compliance. Other personal data contained in it beyond compliance with the law are processed in accordance with the section <i>"41 - Processing of personal data of partners"</i>.</p>
<p>(if any) Recipients and categories of recipients of personal data (Article 13 1/E) – designated by serial number according to the "Processors" table</p>	<ul style="list-style-type: none"> · A2: IT Operation · A3: Accounting
<p>(if any) In the case of processing based on Article 6 (1) (f), a description of the legitimate interests of the controller or third party (Article 13 1/D)</p>	<p>-</p>
<p>Duration of storage of the processed data or criteria for determining that period (Article 13 2/A)</p>	<p>Until the expiration of the enforceability of the rights and obligations arising from the legal relationship in respect of which the controller processes the personal data, in respect of data which are presented on supporting documents and the document confirms the accounting accounts, the processing of data for a period of at least 8 years pursuant to Section 169 (2) of Act C of 2000.</p> <p>contracts: 5 years after the termination of the contract invoice: under the statutory retention obligation in force</p>



42 – Data management related to the management of contracts and accounts	
Determination of the data source where data are not derived from data subjects (Art. 14 2/F GDPR)	From our contracting partner, the organization issuing the invoice, and the individual or organization receiving the invoice.
(if any) The fact that the controller intends to transfer personal data to a third country or to an international organization . (Article 13 1/F)	The listed partner data will not be transferred to any third country.
Consequences of the obligation to provide data and the consequences of failure to provide it (Article 13 2/E)	We process data in the management of invoices and contracts to ensure compliance with applicable laws. The data provision is required . Consequences of denial of data: <ul style="list-style-type: none">· our organization is unable to comply with applicable legal requirements;· it threatens the contractual agreement with the partner
Automated decision-making (profiling). Information on the logic used , as well as the consequence of the activity on the data subject. (Article 13 2/F)	none
Other information	The invoices do not necessarily contain personal data in all cases, since personal data is not an obligatory element and our organization does not need it to comply with the legal obligation. We shall, as far as possible, proceed with caution regarding the processing of <u>optional</u> personal data provided by the partner. If you disclose other information or data to us, we will consider it voluntary and expressive, so we will also manage it on a <u>consensual legal basis</u> ! Information on the processing of the contact data of natural persons on contracts is provided in the section <i>“41 - Processing of personal data of partners”</i> .



99 - Data processing in connection with the gdpr regulation	
GDPR Article 13 1/C The purpose of data processing:	Due to our compliance with the GDPR Regulation, our organization handles such data to support or document GDPR compliance.
GDPR Article 13 1/C Legal basis of data processing:	· fulfilment of a legal obligation (6./c)
Scope of data subjects :	employees
GDPR Art. 14 1/D Scope and category of personal data processed by the controller	· Data processed in declarations of consent · Data on other documents supporting GDPR compliance
Description of the processing activity	The data subject shall require the consent of the data subject, in the absence of other systems, which is provided using the Declaration of Consent form! Other documents and records of probative value drawn up along the compliance of the GDPR Regulation may also be produced.
(if any) Recipients and categories of recipients of personal data (Article 13 1/E) – designated by serial number according to the “Processors” table	
(if any) In the case of processing based on Article 6 (1) (f), a description of the legitimate interests of the controller or third party (Article 13 1/D)	-
Duration of storage of the processed data or criteria for determining that period (Article 13 2/A)	Declaration of consent: minimum 5 years Other documents: minimum 5 years
Determination of the data source where data are not derived from data subjects (Art. 14 2/F GDPR)	The data comes directly from the employee as the data subject.



99 - Data processing in connection with the gdpr regulation	
(if any) The fact that the controller intends to transfer personal data to a third country or to an international organization . (Article 13 1/F)	Data will not be transferred to any third country.
Consequences of the obligation to provide data and the consequences of failure to provide it (Article 13 2/E)	The data must be provided in the Declaration of Consent. Consequences of denial of data: · our organization is unable to comply with the GDPR Regulation.
Automated decision-making (profiling). Information on the logic used , as well as the consequence of the activity on the data subject. (Article 13 2/F)	none
Other information	



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