

# **Privacy notice for users of online interfaces**



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



### 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 <b>to access</b> 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.	<b>Chapter 5.2.</b>
GDPR Article 16 Your right to <b>rectify your</b> 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.	<b>Chapter 5.4.</b>
GDPR Article 17 Your right <b>to delete</b> 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:	<b>Chapter 5.3.</b>
GDPR Article 18 Your right to <b>restrict the processing of</b> 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.	<b>Chapter 5.5.</b>
GDPR Article 20 Your right to <b>data portability of your</b> 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.	<b>Chapter 5.6.</b>
GDPR Article 21 Your right <b>to object</b> . 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 <b>public interest</b> 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 <b>legitimate interests of the</b> Controller or a third party).	<b>Chapter 5.7.</b>



Összefoglaló tájékoztatás az érintett jogaival kapcsolatban (GDPR 13. cikk 2/b)	
GDPR Article 22 The right to <b>object</b> and <b>automated decision-making</b> 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.	<b>Chapter 5.8.</b>
GDPR Article 34 Your right <b>to inform</b> you in <b>connection with personal data management incidents</b> .	<b>Chapter 5.9.</b>

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

- [https://www.naih.hu/files/CELEX\\_32016R0679\\_HU\\_TXT.pdf](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**.



<b>Information</b>	The publisher of this “Privacy Notice” is also the <b>data management organisation</b> . 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:	<a href="mailto:hcb@hcb.hu">hcb@hcb.hu</a>
Location of data processing:	<a href="http://www.budcb.hu">www.budcb.hu</a>

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



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

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





<b>Competent court (GDPR Art. 79)</b>	
<b>Information</b>	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 <b>data subject has the right</b> to an effective <b>judicial remedy</b> 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:	<a href="#"><b>1055 Budapest, Markó utca 27.</b></a>
Postal address:	1363 Budapest, Pf. 16.

<b>Applicable legislation</b>
<b>As data controllers, we apply the following laws and regulations</b> in the case of processing based on Article 6 (1) (c) when processing is necessary for the fulfilment of the <b>legal obligation</b> of the controller.



### Table of contents of the data management target areas

51 - Data management related to newsletter services and other marketing activities

71 - Cookie-related data management

72 - Google Analytics and AdWords data management

73 - Data management related to the operation of WEB pages - Website server logging

74 - Social networking related data management

### Online interfaces

Main page	<a href="http://www.budcb.hu">www.budcb.hu</a>
Subscribe to newsletter on the main page	
Expert club	
Partners	
Ambassador program	

### 51 - Data management related to newsletter services and other marketing activities

GDPR Article 13 1/C The <b>purpose</b> of data processing:	Data management related to the subscription to the newsletter, during which the data subject receives full <b>general</b> or <b>personalized</b> information about the latest promotions.
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51 - Data management related to newsletter services and other marketing activities	
GDPR Article 13 1/C <b>Legal basis</b> of data processing:	<ul style="list-style-type: none"> <li>• <b>on consent (6./a)</b></li> </ul>
Scope of <b>data subjects</b> :	<ul style="list-style-type: none"> <li>• online user (online interface contributing to data subjects)</li> </ul>
GDPR Article 14 1/D Scope and <b>category of personal data processed</b> by the controller	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> </ul>
<b>Description</b> of the processing activity	<p>In our online systems, subscribe to newsletters is currently possible through the links listed above:</p> <ul style="list-style-type: none"> <li>-on-line subscription</li> </ul> <p><b>If you subscribe to our site, you still need a confirmation click on the “SUBSCRIBE” button!</b></p> <p>The data provided are also handled by our external data processor operating the newsletters.</p> <p>In the case of electronic subscriptions, the contributions are automatically stored. <b>Double-opt-in</b> method is currently not used.</p>
(if any) <b>Recipients and categories of recipients</b> of personal data (Article 13 1/E)see the “Data Processors” table	<p><b>A8:</b> newsletter provider  <b>A9:</b> marketing  <b>A10:</b> Operation of the WEB site  <b>A13:</b> hosting provider</p>
(if any) In the case of processing based on Article 6 (1) (f), a description of <b>the legitimate interests of the controller</b> or third party (Article 13 1/D)	–
<b>Duration of storage</b> of the processed data or criteria for determining that period (Article 13 2/A)	<p>Newsletter service: <b>until the withdrawal of consent!</b></p> <p>The Data Controller shall only process the personal data recorded for this purpose until the data subject unsubscribes from the newsletter service.</p> <p><b>The data subject can unsubscribe from the newsletter at any time!</b></p> <ul style="list-style-type: none"> <li>• By clicking the Unsubscribe button at the bottom of the email, and by submitting an application for revocation of consent” to the e-mail address newsletter@budcb.hu”</li> <li>• You can unsubscribe from the newsletter by mail at: H-1011 Budapest, Szilágyi Dezső tér 1. by submitting a “request for withdrawal of consent”.</li> </ul>



<b>51 - Data management related to newsletter services and other marketing activities</b>	
<b>Determination of the data source</b> where data are not derived from data subjects (Art. 14 2/F GDPR)	<b>The data are derived directly from the data subject.</b>
(if any) The fact that the controller intends to transfer personal data to a <b>third country</b> or to an <b>international organization</b> . (Article 13 1/F)	The listed partner data will <b>not be transferred</b> to any third country.
<b>Consequences of the obligation to provide data and the consequences of failure to provide it</b> (Article 13 2/E)	The provision of data <b>is not mandatory</b> , the marketing newsletter is available on an optional and consented basis. If the data subject wishes the service voluntarily, he must provide the following personal data: <ul style="list-style-type: none"><li>· Name</li><li>· Email address</li></ul>
<b>Automated decision-making (profiling).</b> Information <b>on the logic used</b> , as well as the <b>consequence of the activity</b> on the data subject. (Article 13 2/F)	<ul style="list-style-type: none"><li>· The newsletter is sent out by our colleague through the system.</li><li>· <b>The Controller</b> keeps statistics on the readability of posted newsletters by clicking on links in newsletters. Statistics are <b>anonymous, no personal data are stored except the email address.</b></li></ul>
Other information	

<b>71 - Cookie-related data management</b>	
<b>Information</b>	The message that pops up when you accept the Cookie contains the necessary information.
GDPR Article 13 1/C <b>Legal basis</b> of data processing:	<ul style="list-style-type: none"><li>· <b>on consent (6./a)</b></li></ul>
Scope of <b>data subjects</b> :	<b>users of our online interface</b>



<b>72 – Google analytics and ads data management</b>	
<b>Information</b>	
GDPR Article 13 1/C <b>Legal basis</b> of data processing:	<b>• on consent (6./a)</b>
Scope of <b>data subjects</b> :	<b>users of our online interface</b>

<b>73 – Data management related to the operation of web pages - website server logging</b>	
GDPR Article 13 1/C The <b>purpose</b> of data processing:	Maintaining the security of the website, checking its operation, identifying errors during the viewing of the website and preventing misuse. The Controller’s website may contain links that are not operated by the Controller but are only intended to inform visitors. The Controller has no influence on the content and security of websites operated by partner companies and therefore is not responsible for them.
GDPR Article 13 1/C <b>Legal basis</b> of data processing:	<b>• legitimate interest (6./f)</b>
Scope of <b>data subjects</b> :	<b>users of our online interface</b>
GDPR Article 14 1/D Scope and <b>category of personal data processed by</b> the controller	<ul style="list-style-type: none"><li>• IP address from which the retrieval was made</li><li>• hits</li><li>• browser data</li></ul>
<b>Description</b> of the processing activity	The above data is not suitable for identifying the data subject however, the geographical location of the visitor’s computer can be determined by the IP address. The Controller does not link the data generated during the analysis of log files with other information and does not seek to identify the user’s identity. The addresses of the pages visited, as well as the date and time data on their own are not suitable for identifying the data subject.



<b>73 – Data management related to the operation of web pages - website server logging</b>	
(if any) <b>Recipients and categories of recipients</b> of personal data (Article 13 1/E)see the „Data Processors” table	<b>• IT Operation</b>
(if any) In the case of processing based on Article 6 (1) (f), a description of <b>the legitimate interests of the controller or third party</b> (Article 13 1/D)	Our company has a legitimate interest in the safe operation of the website. Based on the principle of data saving, we use only the amount of data necessary to achieve the goal. 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.
<b>Duration of storage</b> of the processed data or criteria for determining that period (Article 13 2/A)	<b>• pending a positive assessment of the protest of the person concerned.</b>
<b>Determination of the data source</b> where data are not derived from data subjects (Art. 14 2/F GDPR)	• directly from the data subject
(if any) The fact that the controller intends to transfer personal data to a <b>third country</b> or to an <b>international organisation</b> . (Article 13 1/F)	The listed partner data will <b>not be transferred</b> to any third country.
<b>Consequences of the obligation to provide data and the consequences of failure to provide it</b> (Article 13 2/E)	
<b>Automated decision-making (profiling).</b> Information <b>on the logic used</b> , as well as the <b>consequence of the activity</b> on the data subject. (Article 13 2/F)	none
<b>Other information</b>	and therefore is not responsible for their safety.



<b>74 - Social networking related data management</b>	
<b>Information</b>	<p>1. The Controller is available separately on the Facebook and LinkedIn social media portal.</p> <p>2. The purpose of data processing is to share the content on the website. With the help of the Facebook page, the Visitors can find out about the latest promotions.</p> <p>3. By clicking on the "like" link on the Facebook, LinkedIn page of the Controller, the data subject agrees to the publication of the news and offers of the Controller on his own wall. The data controller may use the advertising software of individual social media sites and related services. For example: Conversion tracking, remarketing, retargeting, tag management.) The data is encrypted during the service and the purpose of data processing is to provide ads to the user (s) by social networking sites.</p> <p>The purpose of the data management of users registered on the social network is to distribute or promote or "like" the site, the website and the elements, products, services, promotions related to the website or the website itself.</p> <p>The data subject can find information on the source of data, their handling and the method of transmission and legal basis on the relevant social networking site. Data processing is carried out on social networking sites, so the duration, method of data processing and the possibilities of deletion and modification of data are governed by the regulation of the relevant social networking site!</p> <p><b>In this case, the Hungarian Congress Nonprofit Ltd. NOT THE CONTROLLER!</b></p>
GDPR Article 13 1/C <b>Legal basis</b> of data processing:	Legal basis for data processing: voluntary consent of the data subject to the processing of his personal data <b>on social networks</b> .
Scope of <b>data subjects</b> :	All data subjects who have registered on Facebook/Google+/Twitter/Pinterest/Youtube/Instagram etc. social networking sites and "liked" our website.



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