

## Privacy Notice

on data processing for the use of the website of the Institute for Foreign Affairs and Trade (<http://kki.hu>) and for the services it provides

### 1. Purpose of this Notice

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as: “GDPR”) and to Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: “Information Act”), the **Institute for Foreign Affairs and Trade** (seat: Hungary, 1016 Budapest, Bérc utca 13-15; represented by Márton Ugródsy, director; hereinafter referred to as: “**the Institute**”) has set out the following Notice to protect the personal data processed when users access its website at <https://kki.hu>.

### 2. The identity of the data controller and the place of processing

The controller:

the **Institute for Foreign Affairs and Trade**

staff member responsible for data protection: NÉMETH, Bence

contact: [info@ifat.hu](mailto:info@ifat.hu)

The data related to the use of the website is processed within the organization of the Institute by the following data processor:

Name:	Global Systems Informatika Kft.
Seat:	HU-1119 Budapest, Etele út 57/B.
Tax number:	23768208-2-13
Contact:	<a href="mailto:info@globalsystems.hu">info@globalsystems.hu</a> ; <a href="mailto:gdpr@globalsystems.hu">gdpr@globalsystems.hu</a> ,
Representative:	ALT, Zoltán, manager
Activities:	IT services, website hosting

The place of processing is the Institute and the places commonly used by the processors and employees of the competent data processor. Your data is accessed only to the extent necessary for our duties, the fulfilment of the services you use, and for answering questions and providing information.

### 3. Contacting us via the website

Any data sent to us via the email addresses listed under the ‘Contact Us’ title at the website or disclosed to us via the contact form will only be used for the purposes stated in this clause and will not be passed on to third parties.

**purposes of processing:** to investigate complaints or comments sent to us electronically by visitors, for quality assurance purposed, and to improve our services;

**scope of the data processed:** the data subject's name and email address, and other personal data provided by the data subject in the message;

**legal grounds of processing:** consent provided pursuant to paragraph 6(1)a) of the GDPR;

**duration of processing:** your personal data will be deleted from the system immediately after we have answered your questions. Exceptions to this are cases where a right or claim must be enforced, proceedings involving any court, prosecution, investigating authority, offense authority, administrative authority, the National Authority for Data Protection and Freedom of Information, or any other body authorized by law, pending its final conclusion.

#### 4. Managing video and audio recordings

At public events organized by the Institute, video and/or audio recordings and/or written news items of the participants may be recorded, either qualifying or not qualifying as mass recording. In principle, processing is based on the consent of the persons in question granted by implication when participating in the event.

Subject to the declaration of consent by the data subject, the Institute may post news articles and video and/or audio recordings on the **Institute's website** or under its **Facebook, LinkedIn, SoundCloud, or Twitter** account to promote the Institute and its research activities.

The data subject may, at any time during the data processing, request the erasure of their personal data and acknowledges that it may be removed at any time at the sole discretion of the Data Controller.

Different conditions may apply for various events, but data subjects must always be kept informed of such conditions.

**scope of the data processed:** the data subject's name and biometric data (video image or audio track);

**legal grounds of processing:** consent provided pursuant to paragraph 6(1)a) of the GDPR;

**duration of processing:** your personal data will be erased from the system immediately following the assessment of your request for erasure submitted to the Institute, provided that the request is substantiated. Exceptions to this are cases where the video or audio recording is considered a mass recording, or where a right or claim must be enforced in proceedings involving any court, prosecution, investigating authority, offense authority, administrative authority, the National Authority for Data Protection and Freedom of Information, or any other body authorized by law, pending its final conclusion.

#### 5. Information on data processing when using podcasts

**scope of the data processed:** the data subject's name and biometric data (audio track);

**legal grounds of processing:** consent provided pursuant to paragraph 6(1)a) of the GDPR;

**duration of processing:** your personal data will be erased from the system immediately following the assessment of your request for erasure submitted to the Institute, provided that the request is substantiated. Exceptions to this are data processing for the purposes of archiving in the public interest for scientific and historical research purposes pursuant to Article 89 of the GDPR, or where a right or claim must be enforced, proceedings involving any court, prosecution, investigating authority, offense authority, administrative authority, the National Authority for Data

Protection and Freedom of Information, or any other body authorized by law, pending its final conclusion.

## 6. Information on the use of cookies

In line with general practice, the Institute uses cookies on its website. Cookies alone are not capable of identifying the user.

Cookies are short data files placed on the user's computer by the site visited. The purpose of cookies is to ensure, facilitate or make more convenient the continuous operation of the given infocommunication or online service and to contribute to website development through anonymous statistics.

There are various types of cookies, but they can generally be classified into two large groups: one is temporary (absolutely necessary) cookies, placed on the user's device during a single session (e.g., a single visit to the site); the other type is persistent cookies (such as setting the language for a website) that remain on your computer until deleted. The Institute uses only temporary cookies that are strictly necessary for the operation of the website. Their validity is limited to the duration of the visit. The Institute receives automatically generated information about the visitors of its website for the duration of the visit: the Internet Protocol (IP) address of the visitor, the time of the visit, the data of the pages visited, and the name of the browser used.

### Browser settings

You do not have to accept or allow the use of cookies. You can reset your browser settings to reject all cookies or to notify you when a cookie is sent, but some features or services may not work properly without cookies. Most browsers automatically accept cookies by default, but they can usually be set to prevent automatic acceptance and to offer you a choice each time.

Options for settings are usually found under the "Options" or "Settings" menu of your browser. Please use the "Help" menu in your search engine to find the most appropriate settings.

**purposes of processing:** to ensure that visiting the website is served at the highest possible level

**scope of the data processed:** the Internet Protocol (IP) address of visitors, the time of the visit, the data of the pages visited, the name of the browser used

**legal grounds of processing:** consent provided pursuant to paragraph 6(1)a) of the GDPR;

**data storage deadline:** the length of any given visit

**data storage method:** your personal data are stored electronically

## 7. Rights related to data processing

In the context of processing, the data subject may at any time, through the representative of the Institute:

- request information on processing and request access to the data processed;
- request rectification or completion of inaccurate or incomplete data;
- request the erasure of any data processed on the basis of consent;
- object to the processing;
- request restrictions of processing.

Unless restricted under a statutory interest, the data subject shall have the right to obtain from the Institute confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the following information:

- the purposes of processing;
- the type of authorization for processing (legal grounds);
- when and how such data are processed (duration);
- the type of data processed, along with a copy thereof;
- the recipients or categories of recipients of the personal data;
- transmission to third countries or international organizations;
- from which source the personal data originate, if not from the data subject;
- features of any automated decision-making, if applicable;
- the rights of data subjects;
- options of judicial remedies.

The Institute shall reply to requests for information and access within 25 days. The Institute may charge a reasonable fee based on administrative costs for additional copies of the processed personal data requested by the data subject.

In case of a request for the rectification (modification) of data, the data subject must verify the validity of the data and prove that the person requesting rectification is indeed the person entitled to do so. This is the only way the Institute can verify whether the new data is valid and, if so, to rectify the old one.

If it is not clear whether the data being processed is valid or accurate, the Institute will not rectify the data, but will only indicate that an objection has been lodged by the data subject but that the data may not be incorrect. After confirming the authenticity of the request, the controller shall rectify any inaccurate personal data or supplement the data covered by the request without undue delay. The Institute shall inform the person concerned of any rectification or marking.

In the event of a request for erasure or blocking, the data subject may request the erasure of his or her data, which means that the Institute is obliged to erase the data relating to the data subject without undue delay if:

- the personal data have been unlawfully processed;
- the Institute no longer needs the personal data for the purposes of the processing;
- the data subject withdraws consent on which the processing is and there is no other legal ground for the processing;
- the obligation to erase the data has been imposed on the Institute by legislation and it has not yet complied with it.

The data subject may request the restriction of processing, which the controller will comply with if any of the following are met:

- the accuracy of the personal data is contested by the data subject, where the restriction shall apply for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Institute no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing, where the restriction shall apply for a period in which the verification whether the legitimate grounds of the controller override those of the data subject is pending.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. The Institute shall inform the data subject in advance of the lifting of the restriction on data processing.

If you believe that processing violates the provisions of the GDPR or the Information Act, or if you object to the Institute processing your personal data, we recommend that complaints be first sent to the Institute. Your complaint will always be investigated.

The Privacy Policy of the Institute is available at <https://kki.hu/adatvedelem/>

If you have any questions or concerns regarding data management, please contact us at the following email address: [info@ifat.hu](mailto:info@ifat.hu)

If, despite your complaint, you still object to the way the Institute processes your data or would like to contact the authority directly, you may notify the *Nemzeti Adatvédelmi és Információszabadság Hatóság* (National Authority for Data Protection and Freedom of Information, 'NAIH') (Hungary, 1125 Budapest, Szilágyi Erzsébet fasor 22/c., mailing address: HU-1530 Budapest, Pf.: 5; E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); website: [www.naih.hu](http://www.naih.hu)).

You have the option of seeking judicial redress for the protection of your data, whereby the court shall hear such cases in priority proceedings. You are free to file a claim with the court of your domicile (permanent address) or your place of residence (temporary address) (see at <http://birosag.hu/torvenyszekek>).

To find the court with jurisdiction for your domicile or place of residence, please visit <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

## **8. Legal references**

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR");
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

## **9. Closing provisions**

This Notice shall enter into force on 22 March 2019 and shall remain in effect until revoked.

I hereby order this Privacy Notice to be implemented.

In Budapest, Hungary on 21 March 2019

UGRÓSDY, Márton, signed  
Director