

# PRIVACY STATEMENT

## **Preamble**

MATE Sport Service Provider (MATE Sport Szolgáltató) Non-Profit Ltd. (hereinafter referred to as: Service Provider, Data Controller) shall ensure the lawfulness and expediency of the processing of personal data managed. The purpose of this statement is to provide our guests when entering the swimming pool and before providing their personal data with adequate information about the conditions and guarantees under which the data controller will process their data, and about the duration of processing. We will abide by this notice in all cases involving the processing of personal data, and we consider ourselves to be legally bound by the information contained herein.

Our processing complies with the applicable laws, in particular with the following:

- Regulation 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, repealing Regulation 95/46/EC (General Data Protection Regulation, hereinafter "GDPR");
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information ("Infotv.");
- Act V of 2013 on the Civil Code;
- Act C of 2000 on Accounting;
- Act CL of 2017 on the Rules of Taxation;
- Act CXXXIII of 2005 on the Rules of Personal and Property Protection and Private Investigations (hereinafter referred to as the "Act on the Protection of Persons and Property and Private Investigations");
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Commercial Advertising Activities;
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

## **Defining terms**

1. *data subject/user*: any natural person who is identified or can be identified, directly or indirectly, on the basis of specific personal data;
2. *personal data*: data that can be associated with the data subject, in particular the name, address and the address card which identifies the data subject, in the case of a local or regional resident, the student card/neptun ID, identity card, the personal or other identity document in the case of a pensioner;
3. *special data*:
  - a. personal data revealing racial or ethnic origin, political opinions or political party affiliation, religious or other beliefs, membership of an interest group, sexual orientation,
  - b. personal data concerning health, pathological addiction and personal data concerning criminal offences;

4. *consent*: a freely given and direct indication of the data subject's wishes, based on adequate information, by which they explicitly express their unambiguous agreement to the processing of personal data concerning them, either in full or in relation to specific operations;
5. *objection*: a declaration by the data subject objecting to the processing of their personal data and requesting the cessation of the processing or the deletion of the processed data;
6. *data manager*: the natural or legal person or entity without legal personality who, individually or jointly with others, determines the purposes for which the data are to be processed, takes and implements the decisions concerning the processing (including the means used) or has them implemented by a processor on its behalf;
7. *data management*: any operation or set of operations which is performed upon data, regardless of the procedure used, in particular any collection, recording, filing, recording, classification, storage, alteration, use, retrieval, disclosure, transmission, alignment or combination, blocking, deletion or destruction of data, or any prevention of their further use, taking of photographs, sound recordings or images, or any other physical means of identification of a person (e.g. fingerprints, palm prints, DNA samples, iris scans);
8. *data transmission*: making data available to a specified third party;
9. *disclosure*: making data available to any person;
10. *deletion of data*: rendering data unrecognisable in such a way that it is no longer possible to retrieve it;
11. *data labelling*: the marking of data with an identification mark in order to distinguish them;
12. *data blocking*: the marking of data with an identification mark in order to restrict their further processing either permanently or for a limited period of time;
13. *data destruction*: the total physical destruction of a data medium containing data;
14. *data processing*: the performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data;
15. *data processor*: a natural or legal person or an entity without legal personality which, under a contract with a data manager, including a contract entered into pursuant to a statutory provision, processes data;
16. *data controller*: the public authority which has produced the data of public interest by electronic means or in the course of whose activities the data were generated;
17. *data communicator*: a public authority which, if the data controller does not publish the data itself, publishes the data communicated to it by the data controller on a website;
18. *data file*: the set of data managed in a register;
19. *third party*: a natural or legal person, or an entity without legal personality, other than the data subject, the controller or the processor.

### **Purpose of data processing**

The Data Processor processes the personal data of the Guests for the following purposes:

- Primarily, in the case of purchasing a monthly pass, for the purpose of identifying the pass holder, it is necessary to provide certain personal data, as detailed below.
- Personal data are also essential in the case of issuing an invoice.

### **Legal basis for data processing**

1. Personal data may be processed if
  - the data subject consents, or
  - it is imposed by law or, on the basis of a statutory authorisation and within the scope specified therein, by a decree of a local authority for a purpose in the public interest.
2. Personal data may also be processed where obtaining the data subject's consent would entail impossible or disproportionate costs and the processing of the personal data would be necessary
  - o for compliance with a legal obligation to which the data controller is subject; or
  - o for the purposes of the legitimate interests pursued by the controller or by a third party, and the pursuit of those interests is proportionate to the restriction of the right to the protection of personal data.
3. Where the data subject is incapable of giving consent due to incapacity or for other reasons beyond their control, personal data of the data subject may be processed to the extent necessary to protect their vital interests or those of another person or to prevent or protect against an imminent danger to the life, physical integrity or property of a person, as long as the obstacles to consent persist.
4. The consent or subsequent approval of a legal representative is not required for the validity of a declaration of consent by a minor aged 16 or over.
5. Where the processing based on consent is to implement a contract concluded in writing with the controller, the contract must contain all the information which the data subject needs to know in order to process the personal data, in particular the definition of the data to be processed, the duration of processing, the purposes for which the data are to be used, the fact of transferring the data, the recipients of the data, the use of a data processor. The contract must unambiguously state that the data subject, by signing it, consents to the processing of their data as provided for in the contract.
6. If the personal data have been collected with the consent of the data subject, the controller shall, unless otherwise provided by law, have the right
  - to perform a legal obligation to which they are subject, or
  - pursue a legitimate interest of the controller or a third party, where the pursuit of that interest is proportionate to the restriction of the right to the protection of personal data.

### **The scope of data processed**

When purchasing a monthly pass, the following personal data are required:

- name
- address

## **Processing of personal data related to the use of discount tickets, purpose of data processing**

Proof of eligibility for discounted tickets.

Legal basis for data processing: Data processing is based on voluntary consent in accordance with the EU General Data Protection Regulation (GDPR) and Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.). In order to benefit from discounts, eligibility must be verified, so by acquainting themselves with and accepting in advance the details of the processing of personal data contained in the relevant Privacy Statement posted at the ticket offices and on the website of the data controller, the data subject gives their voluntary consent to the processing of personal data by acting on their own initiative.

### **The scope of data processed**

To be entitled to the benefits, proof of eligibility must be provided by presenting the following documents and identity cards:

- address card, in the case of local or regional residents,
- student card/neptun ID,
- identity card or other form of identification in the case of pensioners

Duration of data processing: until the date of entitlement verification.

Recipient of the data transfer: the processed data are not transferred; the processed data are only processed by means of a verification during the presentation of the documents or identity cards concerned.

### **Duration of data processing**

The Data Controller processes personal data for the duration of the purpose of the processing, in particular for the duration of the legal relationship with the Customer until the Customer requests the deletion of their data or withdraws their consent.

Please also be advised that we are obliged to process personal data which are indispensable for our contractual provision of services or for the performance of our obligations, whether arising from a contract between us or from obligations imposed by generally applicable mandatory legal provisions, regardless of your consent, for the period of time specified by or in relation to the applicable legislation (e.g., for accounting records, this period shall be at least 10 years).

### **Data security**

The Data Controller will take all necessary steps to ensure the security of the personal data provided by the Guests, both in the network system and in the storage and safekeeping of the data.

The data provided to the Data Controller will be stored in an external secure storage service provider, which will not have access to the data managed in this storage. The data controller's work processes are carried out on a computer protected by a password and antivirus software.

### **Guests' rights and means of enforcement**

- The Guest is entitled to receive feedback from the data controller as to whether their personal data are being processed and, if so, they shall be informed of the data processed and any relevant information concerning the processing.
- The Guest may request the Controller to correct inaccurate personal data relating to them without undue delay. Taking into account the purposes of the processing, the Customer may request the integration of their personal data.
- The Guest may require the deletion of their personal data, unless the processing is necessary for compliance with the Controller's legal obligations or for the establishment, exercise or defence of legal claims. The Controller shall delete the personal data without undue delay where the processing is unlawful, incomplete or inaccurate, the purpose of the processing has ceased or the period of storage has expired or has been ordered by a court or public authority, or where the deletion is necessary to comply with a legal obligation to which the Controller is subject.
- Where the Controller processes personal data on the basis of the data subject's consent, the data subject may withdraw that consent. If there is no other legal basis for the processing, the controller shall erase the personal data concerned by the withdrawn consent.
- The Guest shall have the right to obtain, at the request of the Controller, the restriction of processing where
  - the accuracy of the personal data is disputed by the Guest - for the time necessary to verify the accuracy;
  - the processing is unlawful but the Customer objects to the deletion of the data and requests the restriction of use;
  - the Controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
  - or
  - the data subject objects to the processing of their data on grounds of public interest or legitimate interest of the Controller or of a third party.

During the restriction period, the Controller shall not use the personal data for any purpose other than storage.

When exercising the rights of the Guest, the Controller shall examine the data subject's request and take the necessary measures and inform the Guest of those measures or the reasons for not doing so within one month of receipt of the request.

- Enforcement:
  - The Guest may send any request regarding data processing to the Data Controller at the address 2100 Gödöllő, Ady Endre sétány 9. or to the e-mail address [uszoda.godollo@uni-mate.hu](mailto:uszoda.godollo@uni-mate.hu)
  - In the event of a breach of their rights, the data subject may take legal action before the competent court at the address of the Controller or, at their option, at the local court of their permanent address or, failing that, of their place of residence.
  - Furthermore, the Guest may lodge a complaint with the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet Fásor 22/c., hereinafter referred to as "NAIH") and initiate an investigation on the grounds that a violation of rights has occurred or is imminent with regard to the processing of their personal data.