

# PRIVACY NOTICE

## 1. INTRODUCTION

The company Duna Médiaszolgáltató Nonprofit Zrt (“DMSZ”) as the data controller (hereinafter referred to as the “Controller”) regarding the website available at the URL <https://mti.hu> (hereinafter referred to as the “Website”) hereby informs the Website Visitors, Registered Visitors, Contracted Users and Customers about its data processing activities related to its services, the scope of personal data it processes, the principles and practices followed in the processing of personal data, the use of data processors, and the ways and means of exercising the rights of the data subjects.

The Controller attaches great importance to the exercise of the right of informational self-determination of the Website Visitors, Registered Visitors and Contracted Users. The Controller also pays particular attention to respecting the personality rights of Data Subjects. It processes the personal data collected confidentially, in accordance with the applicable data processing legislation and international recommendations, in accordance with this Privacy Notice, and takes all measures to ensure the security of the data. The Controller draws the attention of the Data Subjects to the fact that the DMSZ Privacy Policy ([https://dunamsz.hu/wp-content/uploads/sites/18/2019/07/4\\_sz\\_vezig\\_ut\\_adatvedelmi\\_szabalyzat.pdf](https://dunamsz.hu/wp-content/uploads/sites/18/2019/07/4_sz_vezig_ut_adatvedelmi_szabalyzat.pdf); hereinafter referred to as the “Policy”) issued in CEO Directive No. 18/2022 (V.23.), which is related to this Privacy Notice, contains additional provisions on data processing, which are considered to be of a general nature compared to the provisions of this Privacy Notice.

In the event of any inconsistency between this Privacy Notice and any provision of the Policy, the Controller draws the attention of the Data Subjects to the fact that the relevant provision of this Privacy Notice shall always prevail in relation to the processing of data in connection with the Website.

This Privacy Notice is available on the Controller's website at the URL <https://mti.hu>, where it can be saved and printed at any time. The Policy is also always available in an up-to-date, downloadable and printable format at the URLs linked above. The Controller shall process the personal data provided to it in accordance with the following legislation:

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 (EC) No 95/46/EC (General Data Protection Regulation, GDPR); Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (“Privacy Act”); Act V of 2013 on the Civil Code (“Civil Code”); Act CLXXXV of 2010 on Media Services and on the Mass Media

Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services

The Controller undertakes to ensure that any processing of data related to its activities complies with the requirements set out in this Privacy Notice and in the applicable legislation. The Controller reserves the right to amend the content of the Privacy Notice at any time. The Data Subject who enters into a legal relationship with the Website accepts the terms of this Privacy Notice in force from time to time and consents to the processing of data as set out below.

### 1.1. Details of the Controller:

Name: Duna Médiaszolgáltató Nonprofit Zrt. (“DMSZ”)

Company registration number: 01-10-041306

Registered office: 1038 Budapest, Bojtár utca 41-47, Hungary

Mailing address: 1038 Budapest, Bojtár utca 41-47, Hungary

E-mail: [adatvedelem@dunamsz.hu](mailto:adatvedelem@dunamsz.hu)

Phone number: +36 1 759 5050

Website: <https://dunamsz.hu>

## 1.2. Concepts

### 1.2.1. General concepts

The following basic concepts of data processing are defined in detail in 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 Directive 95/46/EC (General Data Processing Regulation) and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information:

**data protection:** the set of principles, rules, procedures, instruments and methods of data processing that ensure the lawful processing of personal data and the protection of the individuals concerned.

**personal data:** any identifiable data relating to an identified or identifiable natural person (data subject) as well as conclusions drawn from the data in regard to the data subject. In the course of processing, personal data shall be considered personal data as long as the relation to the data subject can be restored. The relation to the data subject shall be considered restorable if the Controller has the technical means necessary for restoration.

**data subject:** a natural person identified or identifiable on the basis of any information.

**natural person:** a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification 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 data:** any data that fall within special categories of personal data, i.e. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**processing:** means any operation or set of operations which is performed on data, regardless of the procedure applied; in particular collection, entering, recording, organisation, storage, alteration, use, retrieval, data transfer, disclosure, alignment or combination, blocking, erasure and destruction, as well as the prevention of the further use of data; taking photos and making audio or visual recordings, as well as the recording of physical characteristics suitable for identification (such as fingerprints or palm prints, DNA samples and iris scans);

**controller:** the natural or legal person or organisation without legal personality which, within the framework laid down in an Act or in a binding legal act of the European Union, alone or jointly with others, determines the purposes of the processing of data, makes decisions concerning processing (including the means used) and implements such decisions or has them implemented by a processor;

**technical processing operations:** mean the totality of data processing operations performed by the processor acting on behalf of, or instructed by, the controller.

**processor:** means a natural or legal person, or an organisation without legal personality which, within the framework and under the conditions laid down in an Act or in a binding legal act of the European Union, acting on behalf, or according to the instructions, of the controller, processes personal data;

**sub-processor:** a natural or legal person, public authority, agency or any other body that processes personal data on behalf of a Processor;

**additional sub-processor:** an additional sub-processor of the sub-processor, engaged with the consent of the Processor, to carry out a specific part of the processing operations specified in the data processing agreement.

**consent:** means any freely given, specific, informed and unambiguous indication of the data subject's wishes, by which he or she, by a statement or a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**objection:** a statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data.

**third party:** any natural or legal person or unincorporated body other than the data subject, the Controller or the processor;

**disclosure:** making the data available to anyone.

**erasure:** making data unrecognisable so that it is no longer possible to recover it;

**cookies:** short data files that are placed on the computer of the data subject by the website visited. The purpose of a cookie is to make the given infocommunication or internet service easier and more convenient.

### 1.2.2. Specific terms used in this Privacy Notice only

**Contracted User:** a contracted user is a natural or legal person who enters into a contract with the Controller for the purpose of subscribing to the news and photo services offered by the Controller as a Service Provider on the Website and purchases a product in this context (hereinafter referred to as the "Subscriber") or places an order with the Controller for the use of the National Communications Directory service<sup>1</sup> for the purpose of publishing a communication (hereinafter referred to as the "Customer").

**Registered Visitor:** a visitor who has an individual email address within the website and to whom the website makes certain non-public features and content available.

**Visitor:** a person who accesses and views the Website without subscribing or ordering.

**Data Subject:** the joint designation of the Contracted User, Subscriber, Customer, Registered Visitor and Visitor, according to the above categories.

### 1.3. In particular, processing is carried out for the following purposes:

Purpose of processing	What exactly does this mean?
Technical data processing	The automatic logging of technical data of data subjects browsing the website on the hosting provider's server in order to ensure the

<sup>1</sup> Service: the Service Provider shall, within the limits of the law, and while exercising the editorial freedom granted to the media service provider, distribute press releases, statements and other textual materials submitted by the User and intended for the public, on the Service Provider's information network, without editorial assistance, without correction, in full, in accordance with the submitted content, to the subscribers of its news service, and publish them on the website of the National Communications Directory operated by the Service Provider as a press service (see the National Communications Directory Policy on the mti.hu website)

	<p>functioning of the website, improve the user experience and provide e-commerce and information society services. The collection of data is based on the consent of the data subjects and the relevant legal requirements. The data processed include the date and time of the visit, the IP address of the visitor's computer, the type of browser, name, e-mail address and other personal data provided by the data subject.</p>
<p>Visitor registration</p>	<p>Sending informative e-mails about news concerning the service, the introduction of new services, discounts, changes in the use of the service.</p> <p>The purpose of the processing is to identify the data subject, to associate him or her in an identifiable manner with the account created on the Website, to send communications (technical messages) related to the creation and operation of the account, which do not constitute advertising. To create an account on the Website for the data subjects in order to manage the services provided online by the Controller in a unified manner. From the account, it is possible to access our various services and to choose the type and channel of advertising communication between the Controller and the User.</p> <p>Upon creation of a new account, we will send a confirmation email, and the link in such e-mail can be used to finalise the registration.</p> <p>A technical message may also be sent about certain services associated with the account.</p>
<p>Sending newsletters</p>	<p>Sending informative e-mails about news concerning the service, the introduction of new services, discounts, changes in the use of the service. The purpose of the processing is to identify the data subject, to associate him or her in an identifiable manner with the account created on the Website, to send communications (technical messages) related to the creation and operation of the account, which do not constitute advertising. To create an account on the Website for the data subjects in order to manage the services provided online by the Controller in a unified manner. From the account, it is possible to access our various services and to choose the type and channel of advertising communication between the Controller and the User.</p>
<p>Information or complaint handling</p>	<p>Providing information: In the case of a request for information initiated by the data subject, the purpose of the processing is to enable the Controller to provide an adequate response to the Contracted User's questions about the Contract,</p>

	<p>to provide information about the contractual terms and conditions, services or other related information.</p> <p>Complaints handling: Where the data subject wishes to lodge a complaint, the purpose of the processing is to investigate, handle and respond to the complaint and to take the necessary steps to resolve it.</p>
--	--

**1.4. Types of data processing:**

- Technical data processing;
- Management of cookies;
- Entering into a contract (subscription or order) via the Website;
- Registration and login to the Website;
- Data processing in the event of contact initiated by the Data Subject.

**2. PRINCIPLES OF DATA PROCESSING**

The processing activities covered by this Privacy Notice are primarily carried out by the Controller for the purposes of contract performance and contact management, and are based on a contract in the case of a Subscriber to the news service of the Website or a Customer of the publication of notices (together: Contracted User), on voluntary consent in the case of a Registered Visitor and Visitor, and on legal obligations. The persons who provide personal data to the Controller are responsible for the correctness, accuracy and timeliness of the personal data provided to the Controller, given that they are not provided by the Controller. The Controller shall not verify the personal data provided to it, nor their authenticity.

By providing an e-mail address to the Controller, each Data Subject also assumes responsibility for the fact that he or she is the only one to use the services of the Controller with the e-mail address provided. With regard to this assumption of liability, any liability in connection with orders placed at a given e-mail address shall be borne solely by the Contracted User who provided the e-mail address to the Controller in the context of the electronic contracting.

The Controller draws the attention of the data subjects to the fact that, if they provide personal data other than their own, it is the duty and responsibility of the data provider to obtain the consent of the other data subject.

The Controller shall treat the personal data provided to it confidentially, for the purposes and in the manner described in this Privacy Notice, and shall disclose them to others for further processing only on the grounds and for the purposes set out in this Privacy Notice.

The Website processes the personal data of Website Visitors and Contracted Users for the purpose of providing the service (full use of the Website), only to the extent and for the duration necessary for that purpose. The processing shall be in line with this purpose at all stages of processing.

### **3. SPECIFIC DATA PROCESSING OPERATIONS**

#### **3.1. PROCESSING ON THE <https://mti.hu> WEBSITE**

##### **3.1.1. TECHNICAL DATA PROCESSING**

Certain technical data of the Data Subjects browsing the Website are automatically logged on the hosting provider's server. Such technical data include the data of the Data Subject's computer logging in, which are generated during the use of the Website and which are recorded by the Controller's system as an automatic result of technical processes.

The legal basis for data processing on the Website is: the consent of the Visitor as the data subject when browsing the Website, the consent of the Customer as the data subject when placing an order successfully on the Website, and Section 13/A(1)–(3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services.

Scope of data processed: date and time of the visit, IP address of the visitor's computer, browser type, name, e-mail address, date and time, and other personal data provided by the Data Subject.

**Purpose of the processing:** The automatic logging of technical data of data subjects browsing the website on the hosting provider's server in order to ensure the functioning of the website, improve the user experience and provide e-commerce and information society services. The collection of data is based on the consent of the data subjects and the relevant legal requirements. The data processed include the date and time of the visit, the IP address of the visitor's computer, the type of browser, name, e-mail address and other personal data provided by the data subject.

**Duration of data storage:** technical data is stored by the Controller for a maximum of 6 months, as it is used to ensure the functioning of the website and to improve the user experience.

##### **3.1.2. MANAGEMENT OF COOKIES**

A cookie is a variable information packet sent by a web server that is recorded and stored on the Data Subject's computer for a predetermined period of time. The purpose of cookies is to improve the user experience and make the use of the site easier and more enjoyable.

Cookies are not in themselves capable of identifying the Website Visitor; they are only capable of recognizing the computer of the Visitor concerned. However, if the Visitor does not want a cookie to be placed on his/her computer, he/she can disable it in the settings of the browser he/she uses.

Most browsers automatically accept cookies by default, but these settings can usually be changed. By changing the settings, one can prevent the automatic acceptance of cookies, or one can set the browser to offer the visitor a choice each time to allow the use of cookies.

The use of cookies for statistical purposes is based on the consent of the data subject. The placement of these cookies on the user's devices can be set and customized by the user, and it is also possible to delete them afterwards in the browser settings.

In determining the requirements for cookies, in addition to the applicable legal regulations, the Controller takes into account and enforces the provisions of the relevant NAIH position and the Opinion of the Working Party on Data Protection 2012/4 established under Article 29 of the EC Data Protection Directive.

**The following service providers have placed the cookies listed below on the Website:**

Cookie name	Cookie type	Duration	Description	Scope of information processed
__Secure-authjs.session-token	essential (essential for the site to work)	max 1 month	Session cookie for logged in user within the frontend app	An encrypted string, including a random string, containing the user's session ID and access tokens. It is only set after a successful login.
__Host-authjs.csrf-token	essential (essential for the site to work)	session	Token against CSRF attacks	A random string of characters, set on the first page load and added to all subsequent requests, to protect against CSRF attacks.
__Secure-authjs.callback-url	essential (essential for the site to work)	session	Callback url for Keycloak client	URL, which tells which page to open after a successful login (home page URL).
language	essential (essential for the site to work)	max 1 year	User interface display language	"hu" and "en" are the allowed values; "hu" displays the user interface in Hungarian, "en" in English
professional_statisticalCookiesAccepted	essential (essential for the site to work)	max 1 year	Whether statistical collection is allowed on the professional portal	Logical value "true" allows the use of cookies and measurement codes for statistical or marketing purposes; not allowed for "false"
professional_cookieBannerAccepted	essential (essential for the site to work)	max 1 year	Whether the user has already made a decision in the statistics collection panel on the professional portal	Logical value "true" means that the user has already set the preferences in the cookie panel, so it does not need to be shown again if "false", this has not yet happened, so the cookie

				panel should be displayed
portal_statisticalCookiesAccepted	essential (essential for the site to work)	max 1 year	Whether statistical collection is allowed on the news portal	Logical value "true" allows the use of cookies and measurement codes for statistical or marketing purposes; not allowed for "false"
portal_cookieBannerAccepted	essential (essential for the site to work)	max 1 year	Whether the user has already made a decision in the statistics collection panel on the news portal	Logical value "true" means that the user has already set the preferences in the cookie panel, so it does not need to be shown again if "false", this has not yet happened, so the cookie panel should be displayed
ROUTEEXT	essential (essential for the site to work)	session	Cookie needed to implement session affinity (external proxy).	Numeric value, required to implement proxy session affinity. The value tells the external proxy which target server instance to forward the request to.
ROUTEINT	essential (essential for the site to work)	session	Cookie needed to implement session affinity (internal proxy).	Numeric value, required to implement proxy session affinity. Its value tells the internal proxy to which target server instance to forward the request.



KEYCLOAK_IDENTITY_LEGACY	essential (essential for the site to work)	session	Cookie needed for Keycloak to work	JWT token, which stores the logged-in user's basic information for the keycloak (for legacy keycloaks).
KEYCLOAK_SESSION	essential (essential for the site to work)	max 1 day	Cookie needed for Keycloak to work	A string containing a random string identifying the user's logged-in Keycloak session.
AUTH_SESSION_ID	essential (essential for the site to work)	session	Cookie needed for Keycloak to work	A string containing a random string identifying the user's logged-in application session.
KEYCLOAK_IDENTITY	essential (essential for the site to work)	session	Cookie needed for Keycloak to work	JWT token, which stores the logged-in user's basic information for Keycloak.
KEYCLOAK_SESSION_LEGACY	essential (essential for the site to work)	max 1 day	Cookie needed for Keycloak to work	A string containing a random string identifying the user's logged-in Keycloak session for legacy keycloaks.
AUTH_SESSION_ID_LEGACY	essential (essential for the site to work)	session	Cookie needed for Keycloak to work	A sequence of random characters that identifies the user's logged-in application session for legacy keycloaks.
_ga	for statistical or analytical purposes	max. 400 days	Google Analytics 4 tracking cookies	Random string, its value is not set by us, it is necessary for Google Analytics statistical and tracking functions to work. It is only present if the user has previously enabled it.

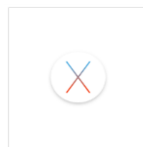
<code>_ga_&lt;RANDOM&gt;</code>	for statistical or analytical purposes	max. 400 days	Google Analytics 4 tracking cookies	Random string, its value is not set by us, it is necessary for Google Analytics statistical and tracking functions to work. It is only present if the user has previously enabled it.
<code>gfp_64b</code>	for statistical or analytical purposes	400 days		domain identifier made up of alphanumeric characters; cookie used by Gemius Hungary Kft. (1053 Budapest, Széputca 5. 1. em. 2.) to ensure the statistical measurements by Gemius.
<code>__gfp_dnt</code>	for statistical or analytical purposes	400 days		domain identifier made up of alphanumeric characters; cookie used by Gemius Hungary Kft. (1053 Budapest, Széputca 5. 1. em. 2.) to ensure the statistical measurements by Gemius.
<code>__gfp_cap</code>	for statistical or analytical purposes	400 days		domain identifier made up of alphanumeric characters; cookie used by Gemius Hungary Kft. (1053 Budapest, Széputca 5. 1. em. 2.) to ensure the statistical measurements by Gemius.

You can find out about the cookie settings of the most popular browsers by following the links below:



#### **Windows**

[Chrome](#)  
[Firefox](#)  
[Explorer](#)  
[Edge](#)



#### **Mac OS X**

[Safari](#)  
[Chrome](#)  
[Firefox](#)



#### **Linux**

[Chrome](#)  
[Firefox](#)



#### **iOS**

[Safari](#)  
[Chrome](#)  
[Firefox](#)



#### **Android**

[Chrome](#)  
[Firefox](#)

### **External service providers / external providers of web analytics and ad serving:**

Other service providers may also place cookies on the Websites. These service providers may have a contract with DMSZ, but they place cookies independently of DMSZ for their own operations.

Users can find out about the use of cookies by DMSZ's external service providers on their own websites.

### **GOOGLE ANALYTICS**

The Controller uses Google Analytics for web analysis and statistics management. Google Analytics uses cookies to help analyse the use of the Website and to generate reports on the activity on the Website.

When using Google Analytics, the IP address transmitted by the visitor's browser will not be linked to other Google data. The Visitor can prevent the storage of cookies by setting his/her browser accordingly, however, in this case, not all functions of the Website may be fully usable.

Information on the service is available at the following link:

<https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage>

More information about Google's data processing is available at <https://policies.google.com/?hl=en>.

### **Gemius Hungary Kft.**

International research and technology company providing digital and cross-media audience measurement and advanced marketing solutions.

Information on the service is available at the following link: <https://gemius.com/privacy-policy/cookie-policy/>

More information on data processing by Gemius Hungary Kft. is available at <https://gemius.com/privacy-policy/>.

### **Cookies placed by third parties not contractually affiliated with DMSZ**

In addition to the above, operators of other services not contractually linked to DMSZ may also place cookies on the website, completely independently of DMSZ, for their own operations. DMSZ does not assume any responsibility for the placement of such cookies by third parties or for any data processing that may be carried out by the placers, and any liability in this regard is disclaimed.

### **3.1.3. VISITOR REGISTRATION**

In order to be able to read an additional 80–100 news items per day, and to use additional services of the Website (e.g. news search, newsletter subscription), the Website Visitor must register.

When registering, you must provide a real e-mail address and password of your choice.

It is possible to modify these data, subscribe or unsubscribe to the newsletter or cancel the registration in the user's profile.

The Controller processes the data provided during registration in the context of the free use contract for the use of its news services, on the legal basis and for the purposes of the performance of the contract, only during the duration of the contract and only to the extent necessary for it.

In the case of a Registered Visitor, it is possible to **change personal data** (change full name and password, subscribe/unsubscribe to newsletter) after “Logging in” to the registered account in the “Profile Data” submenu of the “Settings” menu.

**Request for data erasure:**

In the case of a Registered Visitor, after logging in to the registered account, it is possible to delete the profile by clicking on the “Delete profile” button in the “Settings” menu, “Delete Profile” submenu.

In the case of a Contracted User or Customer, upon termination of the contract between them and the Controller for the use of services previously offered by the mti.hu website, the Controller shall immediately take measures to delete the data.

**Legal basis for processing:** consent of the Data Subject [Article 6(1)(a) GDPR].

**Data Subjects:** natural persons who register on the Website.

**Scope of data processed:** full name, e-mail address.

**Duration of data processing:** until the time the Registered Visitor requests the cancellation of his/her registration.

**3.1.3.1. Subscription to newsletter**

The Website offers the possibility to **subscribe to its newsletter** to Registered Visitors only, irrespective of whether they have registered on the Website or placed an Order. The Website will send newsletters only with the express consent of the Registered Visitor, which consent may be withdrawn by the Registered Visitor at any time.

**Purpose of processing:** sending informative e-mails about news concerning the service, the introduction of new services, discounts, changes related to the use of the service. The purpose of the processing is to identify the data subject, to associate him or her in an identifiable manner with the account created on the Website, to send communications (technical messages) related to the creation and operation of the account, which do not constitute advertising. To create an account on the Website for the data subjects in order to manage the services provided online by the Controller in a unified manner. From the account, it is possible to access our various services and to choose the type and channel of advertising communication between the Controller and the User.

Upon creation of a new account, we will send a confirmation email, and the link in such e-mail can be used to finalise the registration. A technical message may also be sent about certain services associated with the account.

**Legal basis for processing:** consent of the Data Subject [Article 6(1)(a) GDPR].

**Data Subjects:** natural persons (Registered Visitors) who subscribe to a newsletter on the Website.

**Scope of data processed:** full name, e-mail address.

**Duration of data processing:** until the Registered Visitor requests the cancellation of his/her subscription to the newsletter.

**Deletion of data:** by clicking on the “Unsubscribe” button in the newsletter.

When subscribing to the newsletter, Registered Visitors can choose which of the 8 (eight) categories of content they wish to receive the newsletter.

Anyone who consents to marketing enquiries can choose to:

- a) receive only general information or
- b) receive messages and offers (including personalised coupons and gifts), along with the general offers.

### **3.1.4. CONTRACTING VIA THE WEBSITE**

Professional users can subscribe to the MTI news service via the mti.hu website. The National Communications Directory, available via the mti.hu news portal, offers the possibility to order the National Communications Directory's news service. Both the subscription and the order shall be considered as a contract concluded by electronic means, which the Controller shall consider as a written contract and shall register them.

During the conclusion of the contract, it is necessary to provide the (personal) data of the contracting party that are indispensable for the performance of the contract between the Controller and the contracting party and the Controller's related legal obligations. Our data processing activities are primarily for the purpose of fulfilling the contract between the Controller and the contracting party and for maintaining contact.

**Purpose of processing:** to fulfil the contracting party's subscription or order and the resulting contract, to maintain contact for the purpose of fulfilment, and to fulfil accounting obligations.

**Legal basis for processing:** processing is necessary for the performance of a contract to which the Subscriber or the Customer is a party or for taking steps at the request of the Subscriber or the Customer prior to entering into the contract [Article 6(b) GDPR], and processing is necessary for compliance with a legal obligation to which the Controller is subject [Article 6(c) GDPR].

**Data Subjects:** natural persons who are the parties designated by the legal entities as contracting parties to be contacted, who provide their personal data for the purpose of the online contracting process and for the purpose of the contact, and natural persons who are economic operators (sole traders, sole attorneys at law, etc.) who conclude a contract for the use of the National Communications Directory Service.

**Scope of data processed:** notification data [full name of the contact person of the Contracting Party<sup>2</sup>, e-mail address], in case of a natural person who is an economic operator: name, registered office, e-mail address, tax number.

**Source of the data processed:** the data are provided by the Contracting Party or the natural person acting on its behalf when the contract is concluded.

**Duration of data processing:** data necessary for the performance of the contract in accordance with the rules of civil law until the expiry of the general limitation period for any claims arising from the contract,

---

<sup>2</sup> The person designated to submit on behalf of the user (see the “Order form for the use of the press service National Communications Directory (NKT) operated by Duna Médiaszolgáltató Nonprofit Zrt.” on the website mti.hu/nemzeti-kozlemenytar

5 years from the date of termination of the contract for the use of the service, and 8 years for billing data (in accordance with Article 169 of Act C of 2000 on Accounting).

### **3.1.5. LOGIN**

#### **3.1.5.1. Login by direct registration on the Website**

If the Registered Visitor or the Visitor registers directly on the Website, the Controller stores the data provided during the registration on the Website, with the exception of the password. The password is stored by the Controller only in hash format, not in a decryptable way.

**When registering on the Website, the Registered Visitor provides the following personal data:**

surname, first name, e-mail address.

The Controller confirms that the password and password confirmation provided during registration (the password must be at least 8 characters long and contain at least one number and one capital letter) does not constitute personal data.

After logging in to the Website, the Registered Visitor can delete the Registration by clicking on the “Delete Profile” function button in the “Settings” menu under the “Delete Profile” submenu item.

### **3.1.6. PROCESSING IN THE CASE OF CONTACT INITIATED BY THE DATA SUBJECT**

**3.1.6.1. If the Contracted User's contact person requests information directly from the Controller or submits a complaint,** and contacts the Controller electronically or otherwise (by telephone or electronically), the Controller shall process the contact person's personal data in relation to the Contracted User's enquiry, request for information or complaint as follows.

**Purpose of processing:** information or complaint handling

**Legal basis for processing:** in the case of a request for information which does not constitute a complaint: the Contracted User's or the Customer's contract [Article 6(1)(b) GDPR]; processing is necessary for the performance of a contract to which the Contracted User or the Customer is a party or for taking steps at the request of the Contracted User prior to the conclusion of the contract (Article 6(b) GDPR).

**Data Subjects:** the contact person of the Contracted User requesting the information or of the Contracted User lodging the complaint.

**Scope of data processed:** full name and, depending on the type of request and the data provided, e-mail address, text of the message recorded in the e-mail.

**Duration of processing:** Where the processing concerns a contractual relationship between the Controller and the Contracted User, the data necessary for the performance of the contract shall be kept for a period of 5 years from the date of the order, and 8 years in the case of invoicing data (in accordance with Article 169 of Act C of 2000 on Accounting), until the expiry of the general limitation period for any claims arising from the contract under civil law. If it does not affect a contractual relationship between the Controller and the Customer, until the purpose of the processing ceases to exist, but for a maximum of 1 year.

**3.1.6.2. If a natural person who is not a Contracted User requests information directly from the Controller or submits a complaint,** and contacts the Controller electronically or otherwise (by telephone or electronically), the Controller shall process the personal data in relation to the data subject's enquiry, request for information or complaint as follows.

**Purpose of processing:** information or complaint handling

**Legal basis for processing:** consent of the data subject (Article 6(1)(a) GDPR)

**Source of data processing:** data subject

**Data Subjects:** the natural person requesting the information or lodging the complaint.

**Scope of data processed:** full name and, depending on the type of request and the data provided, e-mail address, text of the message recorded in the e-mail, phone number and postal address if applicable.

**Duration of processing:** If the processing concerns a possible claim against the Controller, the general limitation period for any claims under civil law shall be 5 years from the date of the reply to the request until the expiry of the general limitation period. If it does not affect a claim against the Controller that can be enforced at a later date, until the purpose of the processing ceases to exist, but for a maximum of 1 year.

#### **4. DATA PROCESSORS**

We use data processors to operate the underlying IT system, send newsletters, send marketing enquiries and to fulfil legal obligations. We only use data processors who or which provide adequate guarantees to implement appropriate technical and organisational measures to ensure compliance with the legal requirements for data processing and to protect the rights of Data Subjects.

##### **4.1. HOSTING SERVICE**

The tasks of the Hosting Service are not performed by the Controller, but by the

Name: **Media Service Support and Asset Management Fund (MTVA)**

Registration number: Decision No 206/2020 (17.III.)

Registering authority: Media Council of the National Media and Infocommunications Authority

Tax number: 18091715-4-44

Registered office: 1037 Budapest, Kunigunda útja 64, Hungary

Mailing address: 1037 Budapest, Kunigunda útja 64, Hungary

E-mail: [webshop@mtva.hu](mailto:webshop@mtva.hu)

Phone number: +36 1 759 5050

Website: [www.mtva.hu](http://www.mtva.hu)

so the Controller uses a data processor in this context.

##### **4.2. OPERATION OF THE WEBSITE**

ANSWARE Kft. is involved in the operation of the Website, which processes the personal data provided by the Customers and Visitors of the Website during the registration process as a processor for the operation of the Website.

Name: **ANSWARE Informatikai Szolgáltató Korlátolt Felelősségű Társaság**

Abbreviated name: ANSWARE Kft.

Registered office: 1036 Budapest, Lajos utca 74-76, Hungary

Tax number: 10900963-2-41

Company registration number: 01-09-268531

E-mail address: <https://www.sas.answare.hu/?lang=hu>

The website of the data processor: <https://www.sas.answare.hu/?lang=hu>

EN-Co Software Zrt. is involved in the operation of the Website, which processes the personal data provided by the Customers and Visitors of the Website during the registration process as an additional sub-processor for the operation of the Website.

Name: **EN-CO Software Zártkörűen Működő Részvénytársaság**

Abbreviated name: EN-CO Software Zrt.

Registered office: 1118 Budapest, Schweidel utca 5, Hungary

Tax number: 28759999-2-43

Company registration number: 01-10-140987

E-mail address: info@encosoft.hu

The website of the data processor: <https://www.encosoftware.hu/>

#### **4.3. Sending newsletters**

**Interart Consulting Számítástechnikai Kereskedelmi és Szolgáltató és Tanácsadó Kft.**

Registered office: 1147 Budapest, Huszt utca 38. 4. emelet 2. ajtó, Hungary

Tax number: 11489704-2-42

Company registration number: 01-09-695096

E-mail address: info@interart.hu

## **5. HOW PERSONAL DATA IS STORED**

The Controller shall select and operate the IT tools used to process personal data in the course of providing the service in such a way that:

- a) the processed data is accessible to authorised persons (availability);
- b) its authenticity and verification of the data processed is assured (authenticity of processing);
- c) the integrity of the processed data can be verified (data integrity);
- d) the data processed is protected against unauthorised access (data confidentiality).

The Controller shall take appropriate measures to protect the data against, in particular, unauthorised access, alteration, transfer, disclosure, deletion or destruction, accidental destruction, damage or loss, and inaccessibility resulting from changes in the technology used.

The Controller shall ensure, by means of appropriate technical solutions, that the data stored in its various registers cannot be directly linked and attributed to the Data Subject, except where permitted by law, in order to protect the data files managed electronically.



The Controller shall ensure the highest level of security of personal data and provide a level of protection appropriate to the risks associated with the processing by means of technical and organisational measures appropriate to the state of the art and to prevent unauthorised alteration, destruction and use of personal data.

The Controller shall take appropriate measures to protect the data against, in particular, unauthorised access, alteration, transfer, disclosure, deletion or destruction, accidental destruction, damage or loss, and inaccessibility resulting from changes in the technology used.

On the network processing the personal data, the Controller ensures continuous virus protection.

The Controller shall take all necessary measures to ensure the accuracy, completeness and up-to-date status of the personal data it processes. The Controller reserves the right to inform the Data Subjects if it detects a security vulnerability in the system of the Website on the part of the Data Subjects, and at the same time to restrict their access to the system or services of the Service Provider or certain of its functions until the security vulnerability is eliminated.

## **6. THE RIGHTS OF DATA SUBJECTS WITH REGARD TO THE PROCESSING OF THEIR PERSONAL DATA**

### **6.1. Right to information**

All Data Subjects may request information about their personal data processed. The Controller shall, upon the Data Subject's request, and after credible verification and identification of the Data Subject's identity, provide information in a concise, transparent, intelligible and easily accessible form, in clear and plain language, without delay and within 25 days at the latest.

### **6.2. Right of access**

The Data Subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her are being processed. Where such processing is ongoing, the Data Subject shall have the right to access the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom or with whom the personal data have been or will be disclosed by the Controller, including in particular recipients in third countries or international organisations; the envisaged period of storage of the personal data. In the event of a transfer of personal data to a third country or an international organisation, the Data Subject is entitled to be informed of the appropriate safeguards for the transfer.

### **6.3. Right to rectification**

The Data Subject has the right and the obligation to request the rectification of any incorrectly entered data or changed data. Following the credible verification of the identity and identification of the Data Subject, the Controller shall, if the request is credibly supported, carry out the rectification without delay and inform the Data Subject thereof.

### **6.4. Right to erasure**

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 undue delay if:

- the personal data are no longer necessary for the purposes for which they were collected by the Controller
- the Data Subject withdraws his or her consent on the basis of which the data are processed and there is no other legal basis for the processing

- the Data Subject objects to the processing of his or her data and there are no overriding legitimate grounds for the processing
- the personal data were unlawfully processed by the Controller.

During the duration of the contract, where the legal basis for the processing is the performance of the contract or a legal obligation, the Data Subject may not request the erasure of his or her data.

### **6.5. Right to restriction of data**

A request for restriction of data may be made in the following cases:

- the Data Subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the accuracy of the personal data to be verified;
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead,
- the controller no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or
- the Data Subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Controller prevail over the legitimate grounds of the Data Subject.

Where processing is subject to restriction, such personal data may be processed, except for storage, only with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or the protection of the rights of another natural or legal person or of important grounds of public interest of the European Union or of a Member State.

### **6.6. The right to data portability**

The Data Subject may request to receive the personal data concerning him or her provided to the Controller in a structured, commonly used, machine-readable format and to transmit these data to another controller. The Controller will comply with such request within 25 days after credible proof of identity and identification of the Data Subject.

However, the Controller is entitled to refuse to comply with repeated requests within one calendar year or requests that constitute an abuse of rights, or to make compliance with the request subject to the reimbursement of administrative costs if the request is justified.

### **6.7. Right to object**

The Data Subject may object to the processing of his or her personal data (i) if the processing of the personal data is necessary for the fulfilment of a legal obligation to which the Controller is subject or for the purposes of the legitimate interests pursued by the Controller; (ii) if the processing is for direct marketing or public interest purposes; or (iii) if the processing is carried out for the performance of a task carried out in the public interest.

The Controller shall examine the lawfulness of the objection and, if the objection is justified, the processing shall be terminated and the personal data processed shall be blocked, and the Controller shall notify the objection and the measures taken on the basis thereof to all those to whom the personal data concerned by the objection have been previously disclosed.

## **PROCEDURAL RULES**

The Controller shall inform the Data Subject of the action taken on the request pursuant to Articles 15–22 GDPR without undue delay and in any event within 25 days of receipt of the request. If necessary,

and taking into account the complexity of the application and the number of requests, this deadline may be extended by a further two months.

The Controller shall inform the Data Subject of the extension of the time limit within 25 days of receipt of the request, stating the reasons for the delay. If the Data Subject has submitted the request electronically, the information will be provided electronically, unless the Data Subject requests otherwise.

If the Controller does not take action on the request of the Data Subject, the Controller shall inform the Data Subject without delay and at the latest within 25 days of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Controller shall inform each recipient to whom or with which it has disclosed the personal data of any rectification, erasure or restriction of processing that it has carried out, unless this proves impossible or involves a disproportionate effort. At the Data Subject's request, the Controller will inform the Data Subject of these recipients.

## **7. LEGAL REMEDIES**

### **7.1. Complaint to the Controller**

If you believe that the Controller is not complying with or is in breach of the applicable legal requirements or the obligations undertaken in the Privacy Notice, you may report this to the Controller at the following contact details:

**Name of Controller: Duna Médiaszolgáltató Nonprofit Zrt. (DMSZ)**

Mailing address: 1038 Budapest, Bojtár utca 41-47, Hungary

E-mail: [adatvedelem@dunamsz.hu](mailto:adatvedelem@dunamsz.hu)

Phone number: +36 1 759 5050

The Controller shall respond to the Data Subject's complaint in writing in due course, but no later than 30 days, and remedy the complained activity if justified.

### **7.2. Right to apply to the courts**

The Data Subject may bring an action against the Controller in court in the event of a breach of his or her rights. The court shall handle the case as a matter of priority. The jurisdiction to decide the lawsuit lies with the Budapest-Capital Regional Court, which is the competent court of the seat of the Controller Duna Médiaszolgáltató Nonprofit Zrt. The Data Subject may, at his or her own discretion, bring the action before the regional court competent for his or her place of domicile or, in the absence thereof, the place of stay (for a list of courts and their contact details, see <http://birosag.hu/torvenyszekek>; for information on their territorial jurisdiction, see <http://birosag.hu/ugyfelkapcsolati-portal/illeteksegkereso>).

### **7.3. Name and contact details of the Supervisory Authority**

Complaints about data processing can be addressed to the National Authority for Data Protection and Freedom of Information:

**National Authority for Data Protection and Freedom of Information**

Registered office: 1055 Budapest, Falk Miksa utca 9-11, Hungary

Mailing address: 1363 Budapest, Pf.: 9, Hungary

Phone:

+36 30 683-5969

+36 30 549-6838

+36 1 391-1400

Fax: +36 1 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## **8. MISCELLANEOUS PROVISIONS**

Effective date: This Notice is effective from 02/09/2024 until further notice and until revoked.

Personal scope: This Notice applies to the persons whose data are included in the processing covered by this Notice and to persons whose rights or legitimate interests are affected by the processing.