

PRIVACY POLICY

on the processing of personal data in connection with contact persons of participating entities in international co-operations involving the Hungarian Competition Authority

(effective from 10 October 2024)

This privacy policy describes what personal data is processed, for what purposes, in relation to international co-operations involving the Hungarian Competition Authority, and what your data protection rights are in this context. Considering Article 13 and 14 of the 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 (General Data Protection Regulation; hereinafter GDPR), the GVH provides the following information.

1. The details of the controller

Name: Hungarian Competition Authority – Gazdasági Versenyhivatal (GVH)
Representative: Csaba Balázs Rigó president
Address: HU-1026 Budapest, Riadó u. 1-3.
Postal address: HU-1534 Budapest, Pf. 958.
Phone number: +36 (1) 472-8900
Homepage: www.gvh.hu

2. The name and contact details of the data protection officer

Name: Gyöngyvér Szili-Bán dr. LL.M.
E-mail address: adatvedelem@gvh.hu
Phone number: +36 (1) 472-8900

3. Circumstances of data processing, legal basis, period of storage and type and source of personal data

3.1 Data processing related to contacting persons of participating entities in international co-operations:

In the case of international co-operations, the GVH contacting with the employees of the participating entities.

Scope of the data processed	Purpose of data processing	Legal basis for processing	Period of storage
<ul style="list-style-type: none"> • name, • e-mail address, • phone number <p>The source of the personal data is the data subject or his/her institution.</p>	<p>These personal data will be processed by the GVH only for the purposes of the co-operation in question, to contact the entities represented by those contact persons for information, clarifications, and requests.</p>	<p>According to Article 6(1)(e) of the GDPR, processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the GVH regarding Section 33 (4) of Act LVII of 1996 on the Prohibition of Unfair Trading Practices and Unfair Competition.</p>	<p>Personal data will be deleted from the records of the GVH when such information, clarifications, and requests are no longer needed to reach the purpose of processing.</p>

Persons entitled to access the data: the employees of the GVH.

4. Data processors and transfer of personal data

The GVH uses the following data processors:

4.1. WSH Kft.

Address: HU-1117 Budapest, Budafoki út 97.

Phone number: +36 1 353 9800

E-mail: wsh@wsh.hu

Home page: <https://www.wsh.hu/>

WSH Kft. provides operational support tasks related to GVH's network infrastructure.

4.2. Microsoft Ireland Operations Ltd. and Microsoft Corporation

Microsoft Ireland Operations Ltd.

Address: One Microsoft Place, 11 South County Business Park Leopardstown
Dublin 18, D18 P521, Ireland

Microsoft Corporation

Address: One Microsoft Way, Redmond, Washington 98052 USA

When using Microsoft services (such as Microsoft Forms), Microsoft transfers personal data to a third country or international organization in accordance with the EU – U.S. Data Privacy Framework adequacy decision (Article 45 of the GDPR). More information about Microsoft's data processing can be found on the following pages:

<https://privacy.microsoft.com/en-gb/privacystatement>

<https://support.office.com/en-gb/f1/topic/9c1e3d75-1ae3-4587-adf6-616ed694e440?showContactUsNav=False&ns=MICROSOFTFORMS&version=16&ThemeId=6&IsSasFeedbackEnabled=False>

<https://support.microsoft.com/en-us/office/gdpr-information-e9fe9fac-20cf-4298-a138-d6a1b8dc6108>

Furthermore, pursuant to the law, various bodies and authorities may request the GVH to provide information, to disclose or transfer data or documents, and the GVH shall only disclose to the bodies and authorities the amount of personal data that is strictly necessary for the purpose of the request, provided that the exact purpose and scope of the data have been specified.

The GVH shall not transfer any personal data contained in this privacy policy to a third country or international organisation. No data processor is involved in the processing of data.

5. Rights of the data subject

5.1 Right of access by the data subject

You shall have the right to obtain information through the contact details provided in points 1 and 2 or through the contact details of the colleagues involved in the co-operations as to:

- how the GVH obtained your personal data, on what legal basis, for what purpose and for how long;
- to whom, when and under what law the GVH has given access to your personal data, or to whom, when and under what law it has transferred them;
- the existence of the right to request from the GVH access to rectification or erasure of personal data or restriction of processing of personal data concerning the data subject and to object to such processing;
- the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information or bring an action before the competent court as detailed in point 6.

The GVH shall comply with your request within a maximum of 1 month through the contact details available to it or provided in your request.

5.2 Right to rectification

You shall have the right to obtain from the GVH with appropriate justification the rectification of your inaccurate personal data through the contact details provided in points 1 and 2 or through the contact details of the colleagues involved in the co-operations. The GVH shall comply with your request without undue delay and inform you through the contact details available to it or provided in your request. The GVH shall communicate any rectification of personal data to each recipient to whom the personal data have been disclosed unless this proves impossible or involves disproportionate effort. The GVH shall inform you about those recipients if you request it.

5.3 Right to erasure

The GVH will delete your personal data as specified in each case of processing. The GVH will also delete your personal data at your request, if:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the GVH, or
- you object to the processing and there are no overriding legitimate grounds for the processing, or
- the personal data have been unlawfully processed, or
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the GVH is subject.

The GVH shall communicate any erasure of personal data to each recipient to whom the personal data have been disclosed unless this proves impossible or involves disproportionate effort. The GVH shall inform you about those recipients if you request it.

5.4 Right to restriction of processing

You shall have the right to contact the GVH through the contact details provided in points 1 and 2 or through the contact details of the colleagues involved in the co-operations and shall have the right to obtain from the GVH restriction of processing where one of the following applies:

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

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your 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. If you have obtained restriction of processing, you shall be informed by the GVH before the restriction of processing is lifted. The GVH shall communicate any restriction of processing to each recipient to whom the personal data have been disclosed unless this proves impossible or involves disproportionate effort. The GVH shall inform you about those recipients if you request it.

5.5. Right to object

You shall have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data on the basis of Article 6 (1) (e). In this case, the GVH shall no longer process the personal data, unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

6. Right to administrative and judicial remedy regarding to the processing of personal data

If you feel that the GVH has violated the applicable data protection requirements, you have the right to contact the data protection officer of the GVH, and/or to lodge a complaint with the National Authority for Data Protection and Freedom of Information and request an inquiry.

Please find below the contact details of the National Authority for Data Protection and Freedom of Information (NAIH):

Homepage: www.naih.hu

Address: HU-1055 Budapest, Falk Miksa u. 9-11.

Postal address: HU-1363 Budapest, Pf.: 9.

Phone number: +36 (1) 391-1400; +36 (30) 549-6838; +36 (30) 683-5969

E-mail address: ugyfelszolgalat@naih.hu

In order to ensure the protection of your personal data, you also have the right to go to court, which will rule on the case out of turn. If you do not live or reside in Hungary, you may bring an action before the competent court, the Budapest-Capital Regional Court, against the GVH.

7. Other provisions

The GVH reserves the right to unilaterally amend this privacy policy, subject to prior notification to the data subjects via e-mail. The GVH will inform you separately about data processing activities not included in this privacy policy.