

Privacy Policy
on measures taken to reduce the spread of COVID-19 applied to the members of the Hungarian national football team and staff participating in international sports events with the assistance of UEFA held in Hungary

1. Where can you find information on data processing?

MLSZ has prepared this policy in accordance with the provisions of the General Data Protection Regulation of the European Union 2016/679 (hereinafter: GDPR or Regulation) with the specific purpose of making the data processing operations transparent in an easily understandable way. This privacy policy is available on the Internet at adatvedelem.mlsz.hu and be placed at the location of the event. A document called General Information on Data Processing is available [here](#).

Data of the Data Controller:

Name: Hungarian Football Federation

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2. Presentation of processing cases and the scope of processed data

Preparation of the SARS-CoV-2 RNA test for players and staff members

In order to prevent the spread of the COVID-19 virus, UEFA set out the protection measures to be followed at international events in a document entitled Return to Play Protocol (hereinafter referred to as the **Protocol**).

Based on the Protocol, for both domestic and foreign sporting events, all members of the national team (including all frame players who may enter the zone designated for athletes in a UEFA match, together with the technical and operational staff - coaches, assistants, kneaders, doctors, contacts, press and team manager, etc. – hereinafter jointly referred to as the **Team**) shall be tested for SARS-CoV-2-RNA according to the **Protocol** by a specified date and frequency.

The name and a sample from the nose and throat are required to perform the test.

Sampling, testing and evaluation are performed by Synlab Hungary Kft. in the case of sampling in Hungary and by a sample collection and laboratory diagnostic service provider (hereinafter referred to as the **Testing Service Provider**) appointed and accredited by UEFA in the case of foreign sampling.

The Testing Service Provider uploads all relevant results to an online interface created jointly by UEFA and the Testing Provider. Only the medical contact person (Medical Liaison Officer) designated for the frame has access to the interface on the MLSZ side, who can check the status and results of the tests. The Medical Liaison Officer countersigns the fact of the inspection in the system and can print a list of the inspected data (only available to an express UEFA provision) and create a certificate which shall be printed out in accordance with the Protocol and handed over to the data subjects. Data subjects are required to present the certificate together with their ID with photo to obtain

accreditation for the sporting event. After that, the MLSZ does not have access to the printed certificates, it can be destroyed by data subjects.

During the sampling, the Testing Service Provider acts as an independent data controller in accordance with the special rules for health data processing. The Testing Service Provider shall take steps to obtain the consent required to perform the test. However, it is important, that an international sports event may not be attended to a Team Member who does not have a negative test or if the result is not uploaded to the UEFA system.

After the match and after the time specified by UEFA, the Medical Liaison Officer shall not have access to the data stored in the interface created jointly by UEFA and the Healthcare Provider.

3. Duration of data processing

The processed data is not stored by the MLSZ or the Medical Liaison Officer, the contact list is not printed. The data is available in the UEFA system for a period of time determined by the UEFA, and the Testing Service Provider handles the data in accordance with its own privacy policy.

4. Purpose of data processing

The purpose of the data processing is to reduce the possibility of viral infection during the matches to the lowest possible level and the MLSZ be able to comply with the requirements imposed on it by UEFA.

5. Recipients of data, categories of recipients

The team manager uploads the names, dates of birth and whereabouts of each member of the Team to a UEFA-defined interface, from which the names are transferred to a platform jointly created by UEFA and the Testing Service Provider, where the data subjects also receive a generated unique ID.

The Test Results of the Team Members are uploaded by the Testing Service Provider to an interface developed jointly by it and UEFA, through which the Medical Liaison Officer (with a valid username and password) can be informed about the results. UEFA has access to the data already verified by the Medical Liaison Officer.

6. Source of personal data

The name, date of birth and place of residence are given to the MLSZ by the data subject, the test results are sent from the Testing Service Provider to the interface jointly created by it and UEFA. The Medical Liaison Officer can access the data from this time.

7. Legal basis for data processing

Pursuant to Article 6 (1) (f) of the Regulation, the legal basis for the data processing is the MLSZ's legitimate interest in being able to prove the fruition of the provisions of the Protocol, thus all members of the Team can participate in the given sporting event.

8. Rights of the Data Subject

Under the General Data Protection Regulation 2016/679 of the European Union, data subjects have several rights (e.g. request for information, right to access personal data, right to erasure and forget, right to restrict, right to withdraw consent, right to apply to supervisory authority and court) what rights can be exercised, how and on what legal basis of data processing, the document entitled [General Information on Data Processing](#) contains at the link referred to in point 1.

You can access the forms required to exercise your rights [here](#).

The privacy policy is effective as of September 4, 2020, the archived version can be found under the privacy policy, among the downloadable documents.