

# General information on data processing

## (General privacy policy and handling of complaints)

If you have any questions related to the processing, please contact us using any of the following contact details:

email address: [mlsz@mlsz.hu](mailto:mlsz@mlsz.hu)

name of data protection officer: dr. Németh Ádám (a dr. Németh Ádám Ügyvédi Iroda Ügyvédje)

email address of data protection officer: [adatvedelem@mlsz.hu](mailto:adatvedelem@mlsz.hu)

mailing address: 1386. Budapest 62. Pf. 906/1.

## 1. Your rights in relation to processing

The fact that in case of a specific processing, which rights you are entitled to exercise depends on what legal ground we process your data, which is as follows (but of course you may submit a request to exercise all rights):

Law	Consent	Performance of contract	Legal obligation	Legitimate interest
access to personal data and information relating to data processing	x	x	x	x
right to data portability	x			
right to erasure	x	x		x
right to restriction	x	x	x	x
right to rectification	x	x	x	x
right to object				x
withdrawal of consent	x			
Right to go to supervisory authority and court	x	x	x	x

On behalf of underage data subjects under the age of 16, their rights can be exercised by their legal representative; on behalf of underage data subjects over the age of 16, their rights can be exercised by their legal representative.

### 1.1 Processing concerning handling of complaints

We will answer to the complaints in relation to the processing not later than within a month, which may be extended by further 2 months, where appropriate.

If you want to exercise your rights, we will need you to be identified and we will have to necessarily communicate with you.

MLSZ (Hungarian Football Federation) ensures the identification of the applicant in the following ways:

- personal identification: you can do it at any County Directorate you choose or at the centre of MLSZ, in this case we will carry out your identification personally by using your identity document; and this is the only form of identification which does not involve the recording of your personal data.

- identification by verifying data: if you cannot appear in person for a personal identification, you are required to provide us with any of your identity document's number (this document can be: identity card, passport or driving licence), your mother's maiden name, your place and date of birth and your name. On the basis of the data, by using the document's identifier, we will check in the Personal Data and Address Register if the provided data are real. If they are real, it is verified that you possess an identity document which has the data provided.
- Please note that if you choose to be identified by this or any other method - without personal appearance - we offer during this procedure, MLSZ excludes its responsibilities if any damage and/or other disadvantage will be caused to you or any legal entity or natural person by fulfilling your request.

In case of a legal representative - if the statement of the right to representation is not available in our system - we will also need the applicant to make a statement on the legal representation by a form provided by MLSZ, which also includes the processing of the name, ID number and address of the declarant and the witnesses verifying the statement.

During the identification and/or the statement, the data provided by the data subject and/or the legal representative and the witnesses as well as the request will be retained for 5 years. The request and the related correspondence will also be available in our email account.

In the event of any doubt, we can call the applicant for the carrying out of further identification processes; we will need this if the execution of the request has a legal effect on the applicant or the data subject on the basis of the request. This may be the case if, for example, a person requests the erasure of his data but he is an active football player, and the erasure of the data would mean that we should withdraw his football licence.

On the basis of point f) of paragraph (1) of Article 6 of the Regulation, the legal ground of the processing is the legitimate interest of MLSZ in order to handle the complaints and be able to verify how it acted and what measures it took in respect of the individual complaints.

The processor related to the processing of the request is the operator of mlsz.hu, Relative Kft. (Registered seat: 2000 Szentendre, Tölgy utca 12.).

The hosting and organisation of our documents is performed by PRIV-DAT Dokumentum Archiváló és Tároló Kft. (registered seat: 1116 Budapest, Hauszmann Alajos u. 1.).

## **1.2 The right to withdraw consent**

You are entitled to withdraw your consent to processing at any time; in such case the data provided will be erased from our system. Please take into account that this right can only be exercised in the event of processing based on your consent.

The form is available [here](#).

## **1.2 Request for information and request for a copy (right of access)**

You shall have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, you are entitled:

- to gain access to the data processed (namely request a copy) and
- to be informed about the following:
  - the purposes of the processing;

- the categories of your personal data processed;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you, and in case of a processing based on legitimate interest, you have the right to object to such processing;
- the right to lodge a complaint with the supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making (if any), including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

The purpose of the exercise of right may aim to assess and check the lawfulness of processing; therefore, in case of multiple requests for information, we may charge a reasonable fee for the fulfilment of the information requests.

We will provide you with an access to personal data in a form you ask which can be via email, by post or personal information.

The form is available [here](#).

### **1.3 Right to rectification**

You shall have the right to obtain from us without delay the rectification of inaccurate personal data concerning you.

The form is available [here](#).

### **1.4 Right to restriction of processing**

You shall have the right to obtain from us restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data (if there is no need for verification, we will not apply any restriction either);
- if the processing is unlawful but you oppose the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- you have objected to processing but it is based on our legitimate grounds (in this case, until the verification whether our legitimate grounds override yours, the processing must be restricted).

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.

We will inform you about the lifting of restriction of processing in advance (at least 3 working days before the restriction of processing is lifted).

Please note that in some cases the restriction of processing might have other consequences and thus you might lose some benefits going with processing (e.g. purchasing tickets on the Internet, obtaining discounts for fans or even losing the right to enter the pitch as a player). We will inform you about these contingencies during the exercise of this right.

The form is available [here](#).

### **1.5 Right to erasure – right to be forgotten**

You shall have the right to obtain from us the erasure of personal data concerning you without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent, and there is no other legal ground for the processing;
- you object to the processing based on legitimate interest, and there are no overriding legitimate grounds (namely legitimate interests) for the processing;
- the personal data have been unlawfully processed, and it has been established on the basis of the complaint;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which we are subject.

If, for any legitimate ground, we have made your personal data public and we are obliged to erase them for any reason listed above, and by taking account of available technology and the cost of implementation, we shall take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that you have requested the erasure of any links to, or copy or replication of, those personal data (right to be forgotten). As a rule, we will not make your personal data public. The disclosure only concerns the registered and former registered football players' data specified in the information notice on the public data bank of MLSZ. (You can find our information notice on the public data bank of MLSZ [here](#))

The erasure shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject (such case is, for example, the processing carried out during invoicing, since the storage of the invoice is required by law, or the compulsory registration of the sportsman, registration of the license);

- for the establishment, exercise or defence of legal claims (e.g. if we have a claim you have not fulfilled, or if the processing of a consumer complaint or a complaint against data processing is in progress).

The form is available [here](#).

### **1.6 Right to object**

You shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you based on legitimate interest. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

The form is available [here](#).

### **1.7 Right to portability**

If data processing is necessary for the performance of the contract or processing is based on your voluntary consent, you shall have the right to receive the data you provided for us in machine-understandable form which we will provide you in JSON or csv format; if it is technically feasible, you can ask to have the data transmitted in this form to another controller.

The form is available [here](#).

### **1.9 Remedies**

If you think we have breached a legislative provision relating to the processing of personal data, or we have not executed your request for the termination of alleged unlawful processing of personal data, you may request an investigation procedure from the Hungarian National Authority for Data Protection and Freedom of Information (mailing address: 1530 Budapest, Pf.: 5., email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

Furthermore, please note that you also have the right to bring a civil action in a court.

## **2. Security of personal data**

By using necessary access managing, internal organisational and technical solutions during the operation of IT systems, we ensure that unauthorised persons cannot take possession of your data, unauthorised persons cannot erase, save the data from the system or modify them. We also enforce the privacy and data security requirements against our processor.

We keep records of the personal data breaches; according to our procedure for managing breaches, if a breach under the Regulation happens, we will inform you (if possible) and the supervisory authority.

## **3. Miscellaneous provisions**

MLSZ reserves the right to modify its privacy policies in a way that has no effect on the purpose of the processing and its legal ground.

However, if we intend to carry out further processing of the data collected but for a different purpose than the purpose of collection, before the further processing, we will notify you about the purpose of the processing and the following information:

- the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- your existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning you, and in case of a processing based on legitimate interest, you have the right to object to the processing of personal data, and in case of processing based on consent or contractual relationship, you may request your right to data portability to be guaranteed;
- in case of processing based on consent, you may withdraw your consent at any time;
- your right to lodge a complaint with the supervisory authority;
- whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and of the possible consequences of failure to provide such data;
- the existence of automated decision-making (if any), including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

The processing can only begin after this. If the legal ground of the new processing is consent, your consent is required for the processing in addition to notification.

In other cases, we will inform you about the modification by notice placed on [adatvedelem.mlsz.hu](http://adatvedelem.mlsz.hu)

This Privacy Policy shall be valid from 16 March 2021; its archived version can be found under the policy, among the downloadable documents.