

PRIVACY NOTICE

EUROVELO2025 Conference

24–26 September 2025, Balatonfüred

I. What is this notice about?

This data protection notice (hereinafter: *Notice*) concerns the data processing related to the “EUROVELO2025 Conference”, organised by the Hungarian Cycling Tourism Federation (hereinafter: *Data Controller* or *MAKETUSZ*) for the dates 24-26 September 2025 (hereinafter: *event* or *Conference*).

To apply to be a speaker and register as a participant, please visit <https://eurovelo2025balatonfured.com/>. Preliminary information about the conference, the conference theme, the speakers and the titles of the presentations, downloadable materials of the conference presentations and conference reports (e.g. pictures, videos, summaries) are available to interested parties and participants, with the consent of the stakeholders, via the website [the https://eurovelo2025balatonfured.com/](https://eurovelo2025balatonfured.com/). The reports – with the consent of the stakeholders – are also available on the websites and social media pages of MAKETUSZ, Active Hungary, and the EUROPEAN CYCLISTS' FEDERATION. The e-mail address for contact is info@eurovelo2025balatonfured.com, which is managed by MAKETUSZ and by the organisations appointed by them, as specified in this Notice.

II. Who is the Data Controller?

Name:	Hungarian Cycling Tourism Federation
Registered office:	9700 Szombathely, Berzsenyi D. tér 1.
KSH statistical number:	18877410-9499-517-18
Tax number:	18877410-1-18
E-mail:	info@maketusz.hu
Represented by:	Erzsébet Péntes president

Websites on which the data processing under this Notice takes place:

- www.eurovelo2025balatonfured.com
- www.maketusz.hu
- www.amfk.hu
- www.aktivmagyarorszag.hu
- www.eurovelo.com
- www.ecf.com

III. What principles does the Data Controller follow?

The Data Controller declares that the data processing related to its activities complies with this Privacy Notice and the applicable laws [including, but not limited to, Regulation (EU) 2016/679 of the European Parliament and 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 the repealing Directive 95/46/EC (27 April 2016); hereinafter: GDPR, as well as Act CXII of 2011 on the right to informational self-determination and the freedom of information].

The Data Controller is committed to protecting the personal data of those registering for the conference, including speakers and other participants (hereinafter: *Participants or data subjects*), and considers it of utmost importance to respect the data subjects' right to informational self-determination.

The Data Controller treats personal data confidentially and takes all necessary security, technical, and organisational measures to ensure the safety of the data.

Takes full responsibility for the authenticity and accuracy of the personal data shared by the registrant for the conference. The Data Controller assumes no responsibility for any deficiencies in data submission or any consequences arising from incorrectly provided data.

The Data Controller reserves the right to change or discontinue any content or programme elements of the Conference at any time, and to modify its appearance, content, topics, and operations. These changes do not affect the purpose of the data processing, or the data processing consent outlined here.

The processing is based on the data subjects' explicit, voluntarily and informed consent. The consent for processing is provided by the Conference speaker in a separate statement for the creation and use of still and/or moving images, as well as the use of presentations. Other Conference participants provide consent by explicitly accepting this Notice, ticking the relevant checkbox on the website, using the conference website, registering, and voluntarily providing the relevant data.

The terms used in this Notice should be interpreted in accordance with the definitions provided in the GDPR.

IV. Data processing for conference participants: online registration

Data processed for participation in the conference	Participant's name Organisation represented by the participant Participant's job title Participant's e-mail address Participant's phone number Participant's height Number of days of participation Data required for the financial payment of the registration fee
Purpose of data processing	To enable participation in the conference through registration. Communication, providing information related to the event, the administration and organisation of the Conference, and the organisation of the thematic cycling tour. Identification of the participant when providing a name during questions and answers during the Conference. Sending newsletters. Creating statistics. Billing and maintaining financial records.
Legal basis for data processing	The consent of the data subject [GDPR Article 6(1)(a)] For billing and maintaining financial records, the fulfilment of a legal obligation to the Data Controller [GDPR Article 6(1)(c)]

Duration of data processing	<p>Until deletion is requested by the data subject.</p> <p>In the case of billing and maintaining financial records, the data will be retained for 8 years in accordance with Section 169 of the Act C of 2000 on Accounting.</p>
Data transfer	The Data Controller transfers certain personal data to the designated data processor as necessary and proportionate for the activity specified in Section XI.1 and does not share it with any other data controller.
Right to rectification of data and withdrawal of consent	<p>If you wish to stop the processing of your personal data (withdraw your consent), you can initiate this request via the email address indicated in section II.</p> <p>You can request changes to your data via the e-mail address mentioned in section II.</p>

Participation in the Conference and registration are only available to individuals over the age of 18. By registering, the participant and the website user confirm that they are over 18 years of age. During registration and when using services, it is the user's/participant's responsibility to provide accurate information. The Data Controller is not liable for incorrect data but reserves the right to verify identity and age.

If you no longer wish to attend the conference for which you have registered, you must cancel your participation in advance for a refund, as regulated in the [Terms and Conditions for Registration and Participation](#).

V. Data processing for conference speakers: abstract submission

The scope of data processed whwn applying to make a presentation at the Conference	<p>Subtopic – can be selected based on the preliminary list</p> <p>Applicant's name</p> <p>Applicant's gender</p> <p>Applicant's organization</p> <p>Applicant's position</p> <p>Applicant's country</p> <p>Applicant's address</p> <p>Applicant's e-mail address</p> <p>Applicant's phone number</p> <p>Applicant's image</p> <p>Applicant's introduction (max. 600 characters)</p> <p>Title of the applicant's presentation (max. 20 words)</p> <p>Abstract of the applicant's presentation (max. 1000 characters)</p> <p>Justification for the applicant's presentation, explaining how the presentation contributes to the success of the conference and this topic</p>
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Purpose of data processing	<p>With the application, the applicant enters the selection process and, if selected, can participate in the conference as a speaker.</p> <p>Communication, providing information related to the event, and the administration and organisation of the Conference.</p> <p>The listing of speakers in the Conference programme.</p> <p>Creating statistics.</p> <p>Billing and maintaining financial records.</p>
Legal basis for data processing	<p>The consent of the data subject [GDPR Article 6(1)(a)]</p> <p>For billing and maintaining financial records, the fulfilment of a legal obligation to the Data Controller [GDPR Article 6(1)(c)]</p>
Duration of data processing	We store your data for 5 years from the date of recording (pursuant to Section 6:22 (1) of the Civil Code) or until deletion is requested by the data subject.
Data transfer	The Data Controller transfers certain personal data to the designated data processor as necessary and proportionate for the activity specified in Section XI.1 and does not share it with any other Data Controller.
Right to rectification of data and withdrawal of consent	<p>If you wish to stop the processing of your personal data (withdraw your consent), you can initiate this request via the email address indicated in section II.</p> <p>You can request changes to your data via the email address mentioned in section II.</p>

VI. Data processing related to the organization and implementation of the conference

The scope of data processed for the organization and implementation of the Conference	<p>Name of the speaker</p> <p>Title of the presentation</p> <p>Organization represented by the speaker</p> <p>Position of the speaker</p> <p>E-mail address of the speaker</p> <p>Phone number of the speaker</p> <p>Biography and professional background of the speaker</p>
	Photos and/or videos (images) taken of participants and speakers at the conference.
	The speakers' presentations.
	The Data Controller takes crowd photos and images at the events to document attendance and the popularity of the conference.

Purpose of data processing	<p>Ensuring participation in the conference, communication, administration, implementation, and promotion of the Conference.</p> <p>Sharing photos and/or videos taken during the Conference with participants and interested parties.</p> <p>Publication of the conference presentations for participants and interested parties.</p> <p>Promoting active and cycling tourism, an active lifestyle, the Active Hungary programme, the MAKETUSZ brand, and the Conference itself. Promotional inclusion in promotional information materials.</p>
Legal basis for data processing	<p>The data subject's consent [GDPR Article 6(1)(a)] – for speakers, based on a separate declaration, and for participants, by attending the event.</p> <p>In the case of group photos or videos, consent from the data subject is not required for capturing the footage or using the resulting content, as per Section 2:48(2) of the Civil Code.</p>
Duration of data processing	Until deletion is requested by the data subject.
Data transfer	The Data Controller transfers certain personal data to the designated data processor mentioned in section XI.1, to the extent necessary and proportionate for carrying out the specified activity. The data will not be shared with any other data controller.
Right to rectification of data and withdrawal of consent	<p>If you wish to stop the processing of your personal data (withdraw your consent), you can initiate this request via the email address indicated in section II.</p> <p>You can request changes to your data via the email address mentioned in section II.</p>

VII. Direct marketing (DM)

Processed data	<p>Name of participant</p> <p>Participant's e-mail address</p> <p>Name of the organisation represented by the participant</p>
Purpose of data processing	Marketing inquiries with advertising content related to the Conference and its topics.

Legal basis for data processing	The Data Controller's legitimate interest, as a business interest [GDPR Article 6(1)(f)], is to continuously inform those interested in the Conferences about professional content, events, and services related to the topics discussed at these events, using the contact information available to us. Considering that the recipient of the inquiry is acting within the scope of their economic activity, the processing of personal data does not affect the privacy of the data subjects. Moreover, the data subjects' right to self-determination is ensured. The processing of personal data also serves the interests of the data subjects (through more efficient service use and obtaining useful information). Additionally, the data processing is essential for optimizing the activity, is proportionate, and aligns with the principles of GDPR (14) Preamble paragraph. Thus, the Data Controller's legitimate interest is well-founded.
Option to unsubscribe (objection)	The consent may be withdrawn at any time, free of charge and without limitation or justification, and the data processing may be prohibited. Consent may be withdrawn, and data processing may be prohibited via the Data Controller's e-mail address specified in Section II.
Duration of data processing	Until the withdrawal of consent, until the objection to the sending.
Data transfer	The Data Controller transfers certain personal data to the designated data processor as necessary and proportionate for the activity specified in Section XI.1 and does not share it with any other data controller.

VIII. Data processing related to newsletter subscriptions

The provisions set out in point VI apply accordingly, provided that the purpose of the processing is to ensure the provision of the newsletter sending service. The EUROPEAN CYCLISTS' FEDERATION and Aktív Magyarország Fejlesztési Központ Nonprofit Kft. store the data provided by the data subject solely for the purpose of sending the newsletter. The data of the data subject will be processed exclusively through data processing carried out using computer equipment.

IX. Cookie data processing

The Data Controller may place a small data package, known as a cookie, on the data subject's computer to customize and enhance the website's usability and provide a more complete user experience. Cookies are identifiers sent by the website or a partner server collecting cookies to the computer used by the data subject to identify the computer during their visit to the website and to store technical data regarding the website's use (such as clicks, and other navigation data).

Most browsers automatically accept these cookies by default. Cookie storage can be disabled, and the browser can be set to notify the user before storing a cookie on the computer. These settings apply only to the browser and computer in use, so cookie settings and disabling must be configured separately for each computer and browser. By disabling cookies, the website operator cannot guarantee the proper functioning of all website features and the full use of the website. By using the website for the first time, the website visitor accepts that cookies will be placed on their computer.

Legal basis for data processing	Based on Article 6(1)(a) of the GDPR, the data subject's consent.
Duration of data processing	180 days from the date of accessing the website

a) *Essential cookies* (<https://eurovelo2025balatonfured.com/>)

Essential cookies must always be enabled to ensure that cookie settings are saved for further management.

Cookie ID	Domain	Duration
pll_language	.eurovelo2025balatonfured.com	1 year

Description

The **pll language** cookie is used by Polylang to remember the language selected by the user when returning to the website and to retrieve language information if it is not otherwise available.

Script URL sample

plugins/polylang

b) *Functional cookies* (<https://eurovelo2025balatonfured.com/>)

This website uses Google Analytics to collect anonymous information, such as the number of visitors and the most popular pages.

Enabling cookies helps improve the website.

Cookie ID	Domain	Duration
sbjs_migrations	.eurovelo2025balatonfured.com	Session
sbjs_current_add	.eurovelo2025balatonfured.com	Session
sbjs_first_add	.eurovelo2025balatonfured.com	Session
sbjs_current	.eurovelo2025balatonfured.com	Session
sbjs_first	.eurovelo2025balatonfured.com	Session
sbjs_udata	.eurovelo2025balatonfured.com	Session
sbjs_session	.eurovelo2025balatonfured.com	1 hour

Description

Sourcebuster uses this cookie to identify the source of the visit and store user activity information in cookies. This analytical and behavioural cookie helps improve the visitor experience on the website.

Script URL sample

sourcebuster.min.js

Cookie ID	Domain	Duration
YSC	.youtube.com	Session
VISITOR_INFO1_LIVE	.youtube.com	6 months
VISITOR_PRIVACY_METADATA	.youtube.com	6 months

Description

- **YSC:** YouTube uses this cookie to track views of embedded videos on web pages.
- **VISITOR_INFO1_LIVE:** YouTube uses this cookie to measure bandwidth and determine whether the user should receive the new or the old player interface.
- **VISITOR_PRIVACY_METADATA:** YouTube uses this cookie to store the user's cookie consent status for the current domain.

Script URL sample

youtube.com

X. Google Analytics, Google AdWords, Facebook, Youtube

- a) Google Analytics, Google AdWords, and Facebook pixel, Youtube

During the website visit, Google Analytics, Google AdWords, Facebook Pixel, and YouTube programs are used to measure its traffic, monitor visitors' behaviour, create statistics, and assess the effectiveness of advertisements. These programs handle the following data, among others:

- IP address
- Browser type
- Operating system
- Name and public profile picture used on Facebook
- System activity
- On-site activity (visited pages, interactions)

Further detailed information on data processing by Google and Facebook can be found on the following pages:

- Google: <https://privacy.google.com/your-data.html>
- Facebook: <https://www.facebook.com/about/privacy>

Legal basis for data processing	according to Article 6(1)(a) of the GDPR, the data subject's consent, which is obtained through their visit to the website
Duration of data processing	the data retention period as specified in the privacy policies of the above-mentioned service providers, starting from the website visit

- b) Data processing on the Facebook page

Maketusz, Active Hungary, and the European Cyclists Federation have followers, likers, and sharers on their Facebook profiles, where the processed data includes the data subjects' Facebook profiles. The Data Controller posts photos and videos of their events on the Facebook profile. By participating in the event, the participant agrees that photographs and video footage, both individual and group shots, may be taken during the event and published on the Facebook profile.

Purpose of data processing	the promotion of the social media page and the content displayed there, marketing activities
Duration of data processing	in the case of voluntary consent, until the consent is withdrawn

XI. Data processor(s), data storage, data security

1. Data processor(s)

Name: **Bringásvándor Nonprofit Korlátolt Felelősségű Társaság**

Registered office: 9700 Szombathely, Szily János utca 23. I. em. 3.

Company registration number: Cg.18-09-113817

Tax number: 26604350-2-18

Represented by: Zoltán Péter Simon, Managing Director

Data processing activities:

- The management of the email address info@eurovelo2025balatonfured.com, carried out on behalf of the Data Controller.
- collection of participation fees (billing and maintaining financial records)
- for card payments, recording the fact of successful payment.

Name: **Aktív Magyarország Fejlesztési Központ Nonprofit Korlátolt Felelősségű Társaság**

Registered office: 1037 Budapest, Szépvölgyi út 39.

Company registration number: Cg. 01-09-343790

Tax number: 26768496-2-41

Represented by: György Mirkó Petényi, Managing Director

Data processing activities:

- The management of the email address info@eurovelo2025balatonfured.com, carried out on behalf of the Data Controller.
- participation in event-related communication
- participation in registration management
- Access to the website <https://eurovelo2025balatonfured.com/> on behalf of the Data Controller, processing of data provided by the registrants
- sending newsletters to subscribers based on their e-mail addresses
- participation in the speaker selection process
- participation in the promotion of active and cycling tourism, an active lifestyle, the Active Hungary brand, and the Conference itself.

Name: **EUROPEAN CYCLISTS' FEDERATION**

Registered office: rue de la Charite 22, B-1210 Brussels (Belgium)

Company registration number: 0460439895

Represented by: Jill Warren, CEO Data processing activities:

- Access to the website <https://eurovelo2025balatonfured.com/> on behalf of the Data Controller, management of the data provided by registered users and the participant database
- management of the following websites: www.eurovelo2025balatonfured.com, www.eurovelo.com, www.ecf.com
- event-related communication, sending newsletters to subscribers based on their e-mail addresses
- participation in the speaker selection process
- participation in the promotion of active and cycling tourism, an active lifestyle, the Active Hungary brand, and the Conference itself
- direct marketing.

In addition to the relevant staff of MAKETUSZ, Bringásvándor Nonprofit Korlátolt Felelősségű Társaság, the Aktív Magyarország Fejlesztési Központ Nonprofit Korlátolt Felelősségű Társaság, and the EUROPEAN CYCLISTS' FEDERATION, data processing activities are carried out by:

- **VisitBalaton365 Nonprofit Korlátolt Felelősségű Társaság** (registered office: 1011 Budapest, Szilágyi Dezső tér 1., company registration number: 01-09-392901, tax number: 27516326-2-41) participates in event-related communication, organizing tasks (such as providing bicycles in the specified size for thematic cycling tours), and in the promotion of active and cycling tourism, an active lifestyle, the Active Hungary brand, and the Conference;
- **PR in Hungary Marketing Szolgáltató Korlátolt Felelősségű Társaság** (registered office: 1132 Budapest, Victor Hugo utca 11., company registration number: 01-09-899039, tax number: 14329290-2-41) participates in the organization of the conference, the registration process, and the management of the participant database on behalf of the Data Controller.
- **Márton Áron Darvas independent contractor** (registered office: 1171 Budapest, Nemesbük u. 86., registration number: 50638387, tax number: 67710847-1-42.) development of the <https://eurovelo2025balatonfured.com/> website, registration management;
- **Contabo GmbH** (registered office: Aschauer Straße 32a, 81549 München, Deutschland, company registration number: HRB 180722, tax number: DE267602842), content hosting service for the Conference.
- I acknowledge the following personal data stored in the user account of Hungarian Cyclist Tourism Association (Magyar Kerékpáros Turisztikai Szövetség) (9700 Szombathely, Berzsenyi D. tér 1.) in the user database of www.eurovelo2025balatonfured.com will be handed over to **OTP Mobil Ltd.** and is trusted as data processor. The data transferred by the data controller are the following: name, email address, phone number, and billing address. The nature and purpose of the data processing activity performed by the data processor in the SimplePay Privacy Policy can be found at the following link: <http://simplepay.hu/vasarlo-aff>.

2. Data storage

The location of data storage:

- The data will be stored in the administrative system of the website service provider.
- The photos and videos taken at the conference will be used on the online platforms of the Conference (website), the Data Controller (website, Facebook), the Active Hungary Development Centre Nonprofit Limited Liability Company (website), Active Hungary (website, Facebook, Instagram, Youtube, LinkedIn), Révész Máriusz (Facebook), Eurovelo (website, LinkedIn), European Cyclists Federation (website, Facebook), VisitBalaton365 Nonprofit Korlátolt Felelősségű Társaság (website, Facebook, Instagram), as well as in offline and online publications, and in online or printed press, media products.

3. Data security

The Data Controller takes the necessary technical and organizational measures and establishes appropriate procedural rules to ensure the security of personal data throughout the entire data processing process.

The Data Controller commits to ensuring the security of data and will implement the necessary technical and organizational measures and establish procedural rules to protect the collected, stored, or processed data, preventing their destruction, unauthorized use, and unauthorized modification. The Data Controller

also commits to ensuring that any third parties to whom the data may be transmitted or transferred are also required to fulfil these obligations.

XII. Data subjects' rights in relation to data processing

The following rights apply in relation to data processing:

- Right to information (access) – GDPR Article 15
- Right to rectification (modification, supplementation) – GDPR Article 16
- Right to deletion (right to be forgotten) – GDPR Article 17
- Right to restriction of processing – GDPR Article 18
- Right to data portability – GDPR Article 20
- Right to object to data processing – GDPR Article 21
- Right to lodge a complaint with the competent authority – GDPR Article 77

1. Access to personal data

At the request of the Participant, the Data Controller will provide information on whether it processes personal data related to the Participant and, if so, grants access to the personal data, and informs the Participant of the following details:

- a) the purpose(s) of data processing;
- b) the types of personal data involved in the data processing;
- c) in case of transfer of the Participant's personal data, the legal basis and recipient(s) of the data transfer;
- d) the planned duration of data processing;
- e) the Participant's rights regarding the correction, deletion, and restriction of processing of personal data,
as well as the right to object to the processing of personal data;
- f) the possibility to contact the Authority;
- g) the source of the data;
- h) the name, address of the data processors and their activities in relation to data processing.

The Data Controller will provide a copy of the personal data that is subject to data processing free of charge to the Participant. For any additional copies requested by the Participant, the Data Controller may charge a reasonable fee based on administrative costs. If the Participant submitted the request electronically, the information must be provided in a widely used electronic format, unless the data subject requests otherwise.

The Data Controller is obliged to provide the requested information without undue delay, but at the latest within one month from the submission of the request, in a clear and understandable form, upon the Participant's request. The Participant can submit their access request through the contact details specified in section II.

If the Data Controller's data processing is not based on the consent of the data subject, but rather was initiated abusively by a third party, the data subject may contact the Data Controller with proof of their identity and the relation to the personal data (requesting data erasure, restriction, rectification, objection, or information related to data processing).

2. Request for the rectification of personal data

The Participant is entitled to request the rectification of their personal data or the completion of incomplete data (indicating the correct data) in consideration of the purpose of data processing, through the contact details of the Data Controller specified in section II, in both cases with proof of identity. The Data Controller will carry out the rectification without undue delay in its records and will inform the data subject in writing about the completion of the rectification.

If the Participant disputes the accuracy or correctness of the personal data processed by the Data Controller, and the error or inaccuracy of the disputed data cannot be clearly established, the Data Controller will mark the personal data in question.

3. The deletion of personal data (the right to be forgotten)

The Participant may request, with proof of identity, that the Data Controller delete their personal data without undue delay, through the Data Controller's contact details specified in section II. The Data Controller is obliged to delete the personal data of the data subject without undue delay, if any of the following reasons apply:

- a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- b) the Participant withdraws their consent and there is no other legal basis for the data processing;
- c) the Participant objects to the processing of their personal data;
- d) the processing of the personal data was unlawful;
- e) the personal data must be deleted in order to fulfil a legal obligation under EU or member state law applicable to the Data Controller;
- f) the personal data was collected based on consent for the provision of information society services related to offering services to children.

If the Data Controller has made the personal data public (made it available to third parties) and it is required to delete it under the above conditions, it must take reasonable steps, taking into account the available technology and the cost of implementation, to inform the Data Controllers who process the data subject's personal data that the Participant has requested the deletion of links to or copies or duplicates of the relevant personal data.

Personal data does not need to be deleted if the processing is necessary:

- a) for the exercise of freedom of expression and the right to information;
- b) the fulfilment of the obligation to process personal data under EU or member state law applicable to the Data Controller, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- c) for reasons of public health in the public interest;
- d) for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, if the right to erasure is likely to make it impossible or seriously jeopardize the achievement of the processing; or
- e) for the establishment, exercise, or defence of legal claims.

Upon the termination (failure) of the Conference, the Data Controller will delete the personal data of the Conference Participants related solely to the specific Conference, except for data necessary for the fulfilment of legal obligations (e.g., accounting). Renaming, transforming, or merging the Conference with another conference does not constitute the termination of the Conference.

4. Restriction of data processing

The Participant has the right to request the Data Controller to restrict the processing of personal data instead of rectifying or erasing it, if one of the following conditions is met:

- a) the Participant disputes the accuracy of the personal data, in which case the restriction applies for the period that allows the Data Controller to verify the accuracy of the personal data;
- b) the data processing is unlawful, and the Participant opposes the deletion of the data, requesting instead the restriction of its use;
- c) the Data Controller no longer needs the personal data for data processing purposes, but the Participant requires it for the establishment, exercise, or defence of legal claims; or
- d) the Participant has objected to the processing, in which case the restriction shall apply for the period until it is established that the legitimate grounds of the controller prevail over those of the data subject.

If the data processing is subject to restriction, such personal data may only be processed, except for storage, with the Participant's 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 a member state.

The Data Controller will inform the Participant, who requested the restriction of data processing, in advance about the lifting of the restriction.

5. Right to data portability

The Participant has the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used, and machine-readable format, and is also entitled to transmit these data to another data controller without hindrance from the Data Controller to which they have provided the personal data, if:

- a) the processing is based on consent; and
- b) the processing is carried out by automated means.

In exercising the right to data portability, the data subject is entitled to request, where technically feasible, the direct transmission of personal data between data controllers. This right does not apply where the 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 Data Controller. The right to data portability shall not adversely affect the rights and freedoms of others.

6. Right to object

The Participant may object to the processing of personal data based on the legitimate interests of the Data Controller or a third party.

In the event of the Participant's objection, the Data Controller shall not continue processing the personal data, unless it proves that the processing is justified by compelling legitimate grounds which override the Participant's interests, rights, and freedoms, or by grounds related to the establishment, exercise, or defence of legal claims. The Participant may object at any time to the processing of their personal data based on legitimate interests, including profiling, for reasons related to their particular situation. In this case, the personal data must no longer be processed, unless the Data Controller can demonstrate that the processing is based on legitimate grounds on its part, which override the Participant's interests, rights, and freedoms, or are related to the establishment, exercise, or defence of legal claims. The right to object referred to above

must be explicitly brought to the attention of the data subject no later than at the first contact with them, and the relevant information should be provided clearly and separately from all other information.

The Participant is not entitled to the right to object in cases where the personal data processing is based on:

- a) consent (in which case they may request deletion)
- b) performance of a contract
- c) compliance with a legal obligation
- d) protection of vital interests.

7. Notification and procedural rules relating to the exercise of Participant's rights

The Data Controller shall inform the Participant, without undue delay, but no later than one month from the receipt of the request, about the actions taken following the request for access, rectification, erasure, restriction, objection, and data portability.

If necessary, considering the complexity of the request and the number of requests, this deadline may be extended by a further two months. The Data Controller shall notify the Participant of the extension of the deadline within one month of receiving the request, specifying the reasons for the delay. If the Participant submitted the request electronically, the information should be provided electronically, unless the Participant requests otherwise.

If the Data Controller does not take action following the Participant's request, it shall inform the Participant without undue delay, but no later than one month from the receipt of the request, about the reasons for not taking action, as well as about the Participant's right to lodge a complaint with a supervisory authority and to seek judicial remedy.

Upon the Participant's request, information, notifications, and actions taken based on the request shall be provided free of charge. If the Participant's request is clearly unfounded or – particularly due to its repetitive nature – excessive, the Data Controller may, taking into account the administrative costs associated with providing the requested information, notification, or taking the requested action, charge a reasonable fee or refuse to act on the request. The burden of proving that a request is clearly unfounded or excessive lies with the Data Controller.

XIII. Judicial remedy and the possibility of turning to the National Authority for Data Protection and Freedom of Information

The Data Controller makes every effort to ensure that the processing of personal data complies with legal regulations. However, if the Participant believes that this has not been the case, they have the option to submit a request aimed at enforcing their data subject rights through the Data Controller's contact details specified in Section II.

Please note that anyone may file a complaint with the National Authority for Data Protection and Freedom of Information (mailing address: 1363 Budapest, P.O. 9; registered office: 1055 Budapest, Falk Miksa utca 9-11.; phone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu, website: www.naih.hu) to initiate an investigation on the grounds that a violation has occurred, or there is an imminent risk of violation, regarding the processing of personal data or the exercise of rights related to access to public interest data or data made public for reasons of public interest.

The data subject is entitled to turn to a court in the event of a violation of their rights. The lawsuit falls within the jurisdiction of the court in the location of the Data Controller's registered office. However, at the Participant's discretion, the lawsuit may also be initiated before the court of their place of residence.

We kindly ask you to contact the Data Controller first with any complaints or objections related to data processing before initiating the above procedures.

XIV. Indication of the legislation used

- 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 (GDPR Regulation)
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information
- Act V of 2013 on the Civil Code
- Act XLVIII of 2008 on the Basic Requirements of and Certain Restrictions on Commercial Advertising Activities
- Act CVIII of 2001 on certain issues of Electronic Commerce Services and Information Society Services

XV. Final provisions:

The Data Controller reserves the right to unilaterally amend this Notice within the applicable legal framework. The amendment takes effect upon its publication on the website referenced in Section I. Such publication qualifies as notification to the data subjects.

Budapest, 21 July 2025

Hungarian Cycling Tourism Federation
Data Controller