

# Privacy Policy for Marketing Activities

**IDBC Creative Solutions Kft., IDBC New Tech Kft., and IDBC GO Kft.** are engaged in providing human resources management and IT services related to business process management. Given that the target groups and business partners of the three companies are different, but the provision of services (searching for potential partners, contracting, fulfillment, etc.) mostly follows the same methodology, **the three companies have concluded a joint data controller agreement.**

The essence of the joint data controller agreement is that IDBC Creative Solutions Kft., IDBC New Tech Kft., and IDBC GO Kft. jointly provide and operate the services belonging to their scope of activities (e.g., sales, customer relations).

The preparation and updating of the privacy policy regarding marketing activities, the handling of potential data breaches and reporting them to the data protection supervisory authority as necessary, as well as the exercising of data subject rights, are carried out with the cooperation of IDBC Creative Solutions Kft. If any data protection-related activity (e.g., modifying the privacy policy, contacting data subjects) affects the activities of IDBC New Tech Kft. and/or IDBC GO Kft., IDBC Creative Solutions Kft. acts after consulting with the Parties or the affected Party.

IDBC Creative Solutions Kft., IDBC New Tech Kft., and IDBC GO Kft. (hereinafter collectively: **IDBC** or **Data Controller**) come into contact with natural persons, legal entities, and organizations without legal personality during their business and marketing activities. Legal entities and organizations without legal personality are referred to as "business partners".

In this Privacy Policy, we have summarized the information (purpose, legal basis, and duration of data processing, the scope of personal data processed, etc.) concerning the processing of personal data related to the promotion of IDBC's business activities and IDBC's marketing tasks.

Legislation related to the processing and protection of personal data refers to:

- a) the subject of the personal data (e.g., a natural person coming into contact with IDBC or the representative of a business partner) as the data subject (hereinafter: data subject),
- b) any information relating to the data subject as personal data,
- c) any operation performed on personal data (collection, recording, storage, processing, consultation, transmission, retrieval, viewing, disclosure, etc.) as data processing,
- d) the authorization for data processing as the legal basis of data processing,
- e) the decision-maker regarding the purposes and means of data processing as the data controller,
- f) those who do not belong to the data controller but participate in data processing operations based on a written agreement as data processors,
- g) a person other than the data subject, the data controller, and the data processor as a third party;

therefore, we use these terms in the Privacy Policy.

The Privacy Policy also contains the data protection rights of the data subject (see Section 8).

You can find our privacy policy regarding contact with business partners, cooperation with our existing business partners, and personal data processing related to IDBC's business activities [here](#).

You can read our privacy policy for candidates (job applicants) related to cooperation for job searching and recruitment purposes [here](#).

Employees working at IDBC (including our subcontractors) receive the information on the processing of their personal data before signing their employment or subcontractor contract.

## 1. Names and Contact Details of the Data Controllers

Name of Data Controller 1: **IDBC Creative Solutions Kft.**

Headquarters and postal address: 1138 Budapest, Népfürdő u. 22. Duna Tower Irodaház A torony 13. emelet (Floor 13)

Registering authority: Company Registry Court of the Budapest Metropolitan Court

Company registration number: 01-09-192925

Tax number: 24983332-2-41

E-mail address: [info@idbc.hu](mailto:info@idbc.hu)

Phone number: +36 30 479 8090

Data Protection Officer contact: [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu)

**Name of Data Controller 2: IDBC New Tech Kft.**

Headquarters and postal address: 1138 Budapest, Népfürdő u. 22. Duna Tower Irodaház A torony 13. emelet

Registering authority: Company Registry Court of the Budapest Metropolitan Court

Company registration number: 01-09-861417

Tax number: 13556075-2-41

E-mail address: [info@idbc.hu](mailto:info@idbc.hu)

Phone number: +36 30 479 8090

Data Protection Officer contact: [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu)

**Name of Data Controller 3: IDBC GO Kft.**

Headquarters and postal address: 1138 Budapest, Népfürdő u. 22. Duna Tower Irodaház A torony 13. emelet

Registering authority: Company Registry Court of the Budapest Metropolitan Court

Company registration number: 01-09-283268

Tax number: 25578182-2-41

E-mail address: [info@idbc.hu](mailto:info@idbc.hu)

Phone number: +36 30 479 8090

Data Protection Officer contact: [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu)

## **2. Important Legislation Regarding Data Processing**

- a) Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 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 (GDPR or General Data Protection Regulation)
- b) Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act)
- c) Act V of 2013 on the Civil Code (Civil Code)
- d) Act CVIII of 2001 on certain issues of electronic commerce services and information society services (E-commerce Act)
- e) Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities (Advertising Act)
- f) Act XXV of 2023 on complaints, public interest disclosures, and rules related to reporting abuses (Whistleblowing Act)

### 3. Data Processing Activities

#### 3.1. Registration for online events

IDBC supports those interested in its business activities in accessing information, updates, professional news, and knowledge in various ways, e.g., through online events (webinars, meetups, etc.).

A webinar or meetup is an online roundtable discussion with experts on an announced topic, or a knowledge-transfer event related to a professional issue (hereinafter collectively: online event).

Participation in the online event is possible after registering on the idbc.hu website. With the registration, a contract-like relationship is established between IDBC and the registering natural person, the purpose of which is the processing of data related to the online event (e.g., title, time, application conditions), ensuring and recording participation in the announced online event, identifying participants, and keeping in touch with the participant.

Separate registration is required for each online event. During registration, the name, e-mail address, name of the represented company (optional), job title held at the represented company (optional), and phone number must be provided. Messages containing technical information (e.g., time reminders, online event links) will be sent to the registered e-mail address before and after the event.

Developing its services and nurturing public relations is important for IDBC, therefore, after the online event, it requests participants to fill out a satisfaction questionnaire, which is anonymous and voluntary.

Legal basis for data processing: GDPR Article 6 (1) point b): performance of a contract.

Duration of data processing: 5 years from the provision of personal data (general limitation period).

#### 3.2. Requesting and downloading Ebooks

IDBC also produces electronically downloadable professional publications (hereinafter: ebooks), which explore various current topics of interest, describe HR professional questions and answers, methodological or problem-solving opportunities, or summarize business offers and company profiles.

The prerequisite for requesting and downloading the ebook is providing a name and e-mail address; providing the name of the company represented by the data subject is optional. By providing the name and e-mail address, i.e., requesting the ebook, a contract-like relationship is established between IDBC and the natural person requesting the ebook. The purpose is keeping records related to the electronic professional publication (e.g., topic of requested ebook, identification of the requester, time of request), fulfilling the ebook request, and keeping in touch with the ebook requester.

Developing its services and nurturing public relations is important for IDBC, therefore, after downloading the ebook, it may request ebook requesters to fill out a satisfaction questionnaire, which is anonymous and voluntary.

Legal basis for data processing: GDPR Article 6 (1) point b): performance of a contract.

Duration of data processing: 5 years from the provision of personal data (general limitation period).

#### 3.3. Newsletter

IDBC sends a newsletter to subscribers at regular intervals (a few times a year), detailing news and updates related to its business activities, information on upcoming events (e.g., topic, time, follow-

up), reports on previous events, points of interest, or it may conduct telephone or written opinion polls among newsletter subscribers.

Based on the available information (e.g., job title, area of interest) or the conclusions drawn from them, IDBC carries out profiling and may send special messages, thematic newsletters to different target groups, or make business and business development inquiries (e.g., asking recruiters about HR topics of interest to them).

Subscribing to the newsletter is done by providing a name, e-mail address, and optionally: job title and name of the represented organization.

Subscribing to the newsletter is not a condition for participating in an online event (Section 3.1), requesting an ebook (Section 3.2), or using IDBC's services.

You can unsubscribe from the newsletter at any time. In this case, the data subject will no longer receive notifications about IDBC's latest offers, trends in its field of activity, professional updates, or reports on past online events. Unsubscribing is done by sending a request to the [adatvedelem@idbc.hu](mailto:adatvedelem@idbc.hu) e-mail address (see also: Sections 8.3 and 8.4).

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

Duration of data processing: Until the data subject's consent is withdrawn (see also: Sections 8.3 and 8.4).

### [3.4. Data processing related to exercising the data subject's rights and complaints regarding personal data processing](#)

The data subject may exercise their rights set out in Chapter 8 during all data processing activities carried out by IDBC, and may file a complaint regarding the processing of their personal data with the Data Controller or exercise their right to legal remedy as described in Chapter 9.

Data subject rights are personal rights that can only be exercised personally. The term "exercised personally" means that these rights can be exercised by the person to whom the personal data related to the exercise of the right or the data processing activity affected by the privacy complaint relates.

The full processing of the data subject's personal identification data (name, place and date of birth, mother's name) only takes place if the data subject right cannot be exercised without providing these data, or the complaint regarding data processing cannot be evaluated.

If the exercise of the data subject right or the privacy complaint adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse the fulfillment of the data subject's request to the necessary and proportionate extent or to give a restricted response.

If the problem related to the processing of personal data can be linked to the activities of contributors involved in IDBC's business activities, the given contributor is responsible for the procedure (see: Chapter 6).

In the case of a privacy complaint or the exercise of data subject rights concerning data processors (see: Section 6.2), IDBC will act if the privacy complaint or the exercise of the data subject right concerns the data processing activity requested by IDBC. IDBC may involve the data processor in the investigation of a privacy complaint or data subject right concerning the data processing activity requested by it, and for this purpose, it may transfer the personal data of the data subject under this section to the data processor, provided this does not violate the rights and freedoms of the data subject. Privacy complaints and the exercise of data subject rights concerning activities of the data processor that fall outside the content of the contract concluded between the data processor and IDBC shall be made directly to the data processor.

In order to ensure the exercise of data subject rights and handle privacy complaints (receiving, evaluating, etc.), IDBC processes the data subject's personal data [name, data related to the exercise of the data subject right (topic, time, data related to fulfillment)].

Legal basis for data processing: GDPR Article 6 (1) point c) – fulfilling a legal obligation according to GDPR Article 12 (5) and (6), Articles 15-18, Article 21.

Retention period of personal data: 5 years from the fulfillment of the exercise of the data subject right (from the closure of the case) (general limitation period). If the enforcement of the data subject's rights or the handling of the data subject's complaint entails an official or court procedure, the duration of data processing under this section lasts until the retention period of the documents of the official or court procedure.

### [3.5. Use of Website Cookies](#)

#### [3.5.1. General information about cookies](#)

When someone visits a website, small files called "cookies" (hereinafter: cookie or süti) are placed on their IT device (e.g., computer, laptop, tablet, mobile phone, hereinafter collectively: device), which can serve various purposes. With the help of certain cookies, for example, the server can distinguish between users viewing the website simultaneously; they can also store the activities and preferences of the website visitor, allowing, for example, the preservation of the visiting user's settings (username, chosen language, etc.), so these details do not need to be re-entered the next time the user visits the site. The website owner (the data controller) can also collect data about the device and activity of the website visitor (e.g., browser type and other details, computer operating system, IP address, pages viewed by the user, and website functions used) with the help of cookies.

There are cookies that are essential for the proper functioning of the website; without their use, the smooth use of the website cannot be guaranteed. Others collect information related to the use of the website to make it even more convenient and useful.

Some cookies are only temporary and disappear when the browser session is closed, but there are also those that remain on the device for a longer period. Persistent cookies are those that, unlike session cookies, are permanently stored on the website visitor's device, so they are not automatically deleted when the browser program is closed.

Different browsers allow you to change the default cookie settings (reception), so the user can prevent the automatic acceptance of cookies or set a deletion time. By clicking on the names, you can read more detailed information about the cookie settings of the following browsers:

- [Google Chrome](#)
- [Firefox](#)
- [Managing Safari cookies for Apple devices - Apple Support \(HU\)](#)
- [Microsoft Edge](#)
- [Opera](#)

Cookies can also be used to collect anonymized (without specific personal identification) statistical data, which helps the data controller get a picture of the browsing habits and user experiences of its website visitors.

The data controller may use its own cookies on the website; it determines their purpose and function itself, and third parties have no influence over it. The data controller may also use the cookies of service providers considered third parties. Third parties include, for example, data analytics service providers who help the data controller understand what content the website visitor views, for how long, or what menu items or website functions they use, what interests them, etc. Knowing this data, the data controller can plan the directions for developing its website and/or services, its content, customizable services, etc.

### 3.5.2. Necessary cookies

With necessary cookies, IDBC enables the browsing of its websites and the use of the website's functions. Without the application of these cookies, the smooth use of the website cannot be guaranteed. The necessary cookie itself cannot identify the person visiting the website, so it does not allow personalized (personally identifiable) data storage.

Please note that the purpose of the necessary cookie is to support and facilitate the usability and processes of the website, therefore, if you disable the reception of necessary cookies, it cannot be guaranteed that you will be able to fully use all the functions of the website.

The necessary cookies listed below do not collect personally identifiable, personalized data.

The purposes of applying necessary cookies are:

- a) development and operation of the website;
- b) facilitating the navigation of the user visiting the website;
- c) ensuring access to the functions of the website.

Cookie Name	Cookie Type	Cookie Purpose (Description)	(Description)Duration of Data Processing
PHPSESSID	Session, first-party	Session management, operating login/form processes	Session
wordpress_test_cookie	Test/session, first-party	Checks if the browser supports cookies	Session
wp-wpml_current_language	Session/language, first-party	Temporary storage of the current language for navigation	Session
wp_lang	Session/language, first-party	Management of the interface language	Session

### 3.5.3. Functional cookies

In order to create and maintain the user experience, IDBC ensures the use of certain functions of the website with the help of information allowing the unique identification of the visitors of its websites.

Legal basis for data processing: GDPR Article 6 (1) point f): IDBC's legitimate interest (website operation, user experience, data security measures).

Cookie Name	Cookie Type	Cookie Purpose (Description)	Scope of Processed Data	Duration of Data Processing
wp-settings-1	Functional/ /settings, first-party	WordPress user settings (editor mode, image settings)	Indicates the update time of the wp-settings-1 settings	1 year

wp-settings-time-1	Functional/timestamp, first-party	Indicates the update time of the wp-settings-1 settings	Timestamp, preference-meta	1 year
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### 3.6. Platform Providers, Social Media

In order to promote its business activities and strengthen public relations, IDBC also uses the services of various platform providers (e.g., social media sites). The fundamental goal of platform providers is to make the use of the platform "indispensable" in order to generate profit. To achieve this, they create and maintain connections between participants, shape the user experience with various computer algorithms and design elements, and strengthen commitment to the use of the platform.

Platform providers are independent data controllers with their own terms of use and data protection/data security rules. However, based on the technical/technological solutions applied by the platform providers (e.g., data collectors, machine learning algorithms, language models) and the relevant legislation, it may happen that the platform provider and the data controller qualify as joint data controllers. In the case of joint data processing, the data controller either acts itself or cooperates with the platform provider, depending on what data processing operation needs to be performed regarding the specific personal data.

For the application of this section, a data subject is any natural person (including employees) who views business or employer content published by IDBC through the platform service used (e.g., social media pages), provides a review, reacts to (likes, etc.), or comments on the announcements, offers published by IDBC or regarding IDBC's HR management services or marketing activities, and further, shares the content or any post published by IDBC (e.g., event invitation, podcast, short video) with others. Members of closed groups created by IDBC within the framework of using platform services are also considered data subjects.

The business interfaces provided by platform providers contain numerous options (including computer algorithms collectively referred to as artificial intelligence) that the creator of the business or employer-focused, so-called fan pages (in this case, IDBC) can utilize, but cannot change. This includes, for example, what machine learning or language model solutions the platform provider applies, what personal data it collects about users, what cookies it uses to track visitors to the fan pages (accounting for them, analyzing user behavior).

As the operator of business and fan pages (including closed groups), IDBC generally has access to demographic data regarding its audience (e.g., composition by age, gender, marital status, and professional status), data regarding the lifestyle and interests of its audience (including data regarding the online purchases of persons visiting its fan page), and furthermore, geographic data based on which it can make shared content more targeted and decide where to offer special discounts or organize events. Considering that the data groupings made available by the platform provider may occasionally be suitable for personal identification, while IDBC has no influence over the collection and analysis of these data, it is advisable for users (visitors of IDBC's fan pages, members of closed groups) to configure data protection permissions in their own personal profile created in the platform service that allow the sharing of information belonging to their private sphere to the narrowest possible extent.

IDBC strives to only use the statistical data provided by the platform provider – which cannot be linked to a specific person – during the analysis of the data of its fan pages. The analysis of the data of fan pages generally occurs in the interest of developing the Data Controller's activities and successfully conducting its promotional campaigns.

Please note that joining a business or employer-focused, so-called fan page created by IDBC on any platform service, or joining a closed group created by IDBC with the help of any platform service, is not a condition for establishing and maintaining a business or employment relationship. In this

regard, data subjects may act according to their own decision, taking into account the information provided in this chapter.

#### 4. Profiling, Automated Decision-Making

From the personal data it processes, IDBC occasionally carries out profiling (grouping according to a certain characteristic) with the help of conclusions drawn from the sphere of interest of the person registering for an online event or subscribing to the newsletter, the name of their workplace or represented organization, and their job title. This is used to define the target audience of thematic newsletters and advertising campaigns. During profiling or based on profiles, IDBC does not apply automated decision-making (decisions made exclusively by automated means affecting the data subject).

#### 5. Data Security

IDBC ensures through IT, organizational, and personnel measures that the personal data it processes is protected against, among other things, unauthorized access, unauthorized alteration, or destruction.

Access to personal data stored in the IT system is role-based and logged, meaning it can always be verified who accessed what personal data and when. Authorized, trained employees of IDBC can access the processed personal data exclusively to perform their job tasks and to the extent necessary for that purpose.

#### 6. Access to Data, Contributors (e.g., Data Processors)

IDBC uses business partners and contributors to carry out its marketing activities (e.g., conducting online events, advertising campaigns) and to store the personal data generated during this process. The contributors can be data controllers or data processors.

In the case of platform providers and social media pages (see: Section 3.6), it happens that the company operating them qualifies as an independent data controller (e.g., LinkedIn) or, as in the case of certain functions of Meta/Facebook, qualifies as a joint data controller with IDBC. Independent data controllers are responsible for their own data processing; therefore, they are competent regarding the activities they perform. If IDBC qualifies as a joint data controller with the platform provider during the use of a platform, it must be determined case by case which data processing operation IDBC has an influence on, and only in these cases can data subject rights be exercised through IDBC or complaints regarding data processing be submitted to IDBC.

If the contributing business partner can also access personal data based on IDBC's assignment and can perform one or more data processing operations with them, they qualify as a data processor according to the GDPR. The data processor cannot make data processing decisions; they are exclusively entitled to act according to the contract concluded with IDBC and the instructions received from it during the processing of personal data. IDBC only uses data processors that guarantee a level of data security appropriate to the degree of risk through adequate technical and organizational measures. The specific tasks and responsibilities incumbent on the data processor are contained in the contract between IDBC and the data processor.

##### 6.1. Contributors used by IDBC Qualifying as Independent Data Controllers:

**Facebook and Instagram** – Operator: Meta Platforms, Inc. and Meta Platforms Ireland Limited [European contact: Meta Platforms Ireland Limited; ATTN: Privacy Operations, Merrion Road Dublin 4 D04 X2K5, Ireland]; further details on personal data processing by Meta can be found here:

Facebook: [https://www.facebook.com/privacy/policy?section\\_id=13-HowToContactMeta](https://www.facebook.com/privacy/policy?section_id=13-HowToContactMeta) |  
Instagram: <https://help.instagram.com/155833707900388>

**TikTok** – Operator: TikTok Technologies Limited, which currently has no European headquarters; however, to comply with the EU Digital Services Act, it has published the following contact information: <https://www.tiktok.com/transparency/en/dsa-contact-points/>; TikTok's privacy policy can be read here: <https://www.tiktok.com/legal/page/eea/privacy-policy/hu>; TikTok's cookie information can be found here: <https://www.tiktok.com/legal/page/global/cookie-policy/hu> c)  
**LinkedIn** (Headquarters: 1000 W Maude Sunnyvale, CA 94085, US), its privacy policy can be read here: LinkedIn Privacy Policy. IDBC actively uses LinkedIn's functions and features, which the data subject can influence by setting their own profile.

### 6.2. Contributors used by IDBC Qualifying as Data Processors:

**O365 and Microsoft Teams** – Operator: Microsoft Ireland Operations Limited (Headquarters: Ireland, Dublin 18, Leopardstown, South County Business Park, One Microsoft Place, privacy policy: <https://privacy.microsoft.com/hu-hu/privacystatement>)

**ZOHO Campaigns module** – Operator: ZOHO Corporation Pvt. Ltd. (Name and headquarters of European representative: Zoho Corporation BV, Beneluxlaan 4B, 3527 HT Utrecht, The Netherlands, ZOHO privacy policy: <https://www.zoho.com/privacy.html>, privacy implications of the ZOHO Campaigns module: <https://www.zoho.com/campaigns/gdpr/>)

**Google services** – Operator's European representative: Google Ireland Limited (Headquarters: Gordon House, Barrow Street, Dublin 4, Ireland; privacy information: <https://policies.google.com/privacy?hl=hu&fg=1>)

## 7. Data Transfer

IDBC may occasionally transfer personal data in a documented manner to the National Authority for Data Protection and Freedom of Information, which performs data protection supervision, or to other authorities or courts for their proceedings, for purposes and in manners specified by law.

## 8. Rights of the Data Subject Regarding Data Processing

### 8.1. Right to Information and Access

The data subject may request information in writing from IDBC through the contact details provided in Section 1 about what personal data of theirs is being processed, on what legal basis, for what data processing purpose, from what source, for how long, and to whom, when, based on what legislation the Data Controller granted access to which of the data subject's personal data, or to whom it transferred them.

If the data subject requests the information under this section in multiple copies, the Data Controller is entitled to charge a reasonable fee proportionate to the administrative costs of producing the additional copies.

IDBC fulfills the data subject's request within a maximum of one month in a response letter sent to the contact address provided by the data subject.

### 8.2. Right to Rectification

The data subject may request in writing, through the contact details provided in Section 1, that IDBC modify any of their personal data (for example, they can change their e-mail address or other contact details at any time) or supplement incomplete personal data.

The Data Controller fulfills the request within a maximum of one month, and notifies the data subject of this in a letter sent to the contact address they provided.

IDBC informs those to whom it transferred the data subject's personal data about the rectified data, provided that the information is not impossible or does not require a disproportionate effort from the Data Controller.

### 8.3. Right to Withdraw Data Processing Consent

The data subject may withdraw their consent to data processing at any time, which does not affect the lawfulness of data processing before the withdrawal of consent. If the data processing consent is necessary for conducting an event that the data subject wishes to attend, but they withdraw their consent to data processing, the data subject may not participate in the event following the withdrawal of the data processing consent.

### 8.4. Right to Erasure

The data subject may request in writing from IDBC, through the contact details provided in Section 1, the erasure of all or some of their personal data if one of the following reasons exists:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws their consent to the processing and there is no other legal basis for the processing of personal data;
- c) the data subject objects to the processing of their personal data based on legitimate interest or for the purpose of direct marketing (including profiling applied for direct marketing) and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR (provided to children).

IDBC will not fulfill the erasure if the data processing is necessary:

- a) for exercising the right of freedom of expression and information (see: Section 7.1), or
- b) for compliance with a legal obligation in Union or Member State law to which the controller is subject, or
- c) for reasons of public interest in the area of public health, if the processing is carried out by or under the responsibility of a professional subject to the obligation of professional secrecy, or
- d) for the establishment, exercise, or defense of legal claims, or
- e) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing.

IDBC processes the data subject's erasure request within a maximum of one month and notifies the data subject of the result in a letter sent to the contact address they provided.

IDBC informs those to whom it previously transferred the data subject's personal data about the erasure of the personal data, provided that informing them is not impossible or does not require a disproportionate effort from the Data Controller.

### 8.5. Right to Restriction of Processing (Blocking)

The data subject may request in writing, through the contact details provided in Section 1, that IDBC process their personal data restrictively (block them).

Blocking is done by clearly indicating the restricted nature of the data processing and storing it separately from other data. This means that, with the exception of storage, no other data processing operation may be performed on the data. The blocking lasts as long as the reason indicated by the data subject necessitates the blocked storage of the personal data.

The data subject may request the blocking of personal data, for example, if they believe that IDBC has processed their personal data unlawfully, but it is necessary for the official or court procedure initiated by them that the Data Controller does not erase the personal data. In this case, IDBC processes the personal data in a blocked manner until requested by the authority or court, and erases or continues to process them after the conclusion of the official or court procedure.

### 8.6. Right to Object

The data subject may object in writing to the data processing through the contact details provided in Section 1 if IDBC processes the personal data based on its own or a third party's legitimate interest. The data subject may object to the data processing, for example, if IDBC were to transfer or use the data subject's personal data for public opinion polling or scientific research purposes based on its own or a third party's legitimate interest.

IDBC investigates the data subject's objection within a maximum of one month, and notifies the data subject of the result (including the communication regarding the erasure of any unlawfully processed personal data) in a letter sent to the contact address they provided.

## 9. Enforcement and Remedy Options Related to Data Processing

In order to enforce their rights related to the processing and protection of their personal data, the data subject may contact IDBC through the contact details of the data controllers specified above. If the data subject believes that their rights to the protection of their personal data have been violated, they can seek a legal remedy from the following authority:

National Authority for Data Protection and Freedom of Information (NAIH)

Headquarters: 1055 Budapest, Falk Miksa u. 9–11.

Postal address: 1363 Budapest, Pf. 9.

Phone: +36 (1) 391-1400

Website: [About the Authority](#)

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

If the data subject experiences the unlawfulness of the processing of their personal data, they can initiate a court procedure (civil lawsuit) against the Data Controller. The adjudication of the lawsuit falls under the jurisdiction of the regional court (törvényszék). At the choice of the data subject, the lawsuit can also be initiated before the regional court corresponding to the data subject's place of residence (you can view the contact details of the regional courts via the following link: <https://birosag.hu/torvenyszekek>).

## 10. Updating and Availability of the Privacy Policy

IDBC reserves the right to unilaterally modify this Privacy Policy.

The Privacy Policy may be modified, in particular, if necessary due to changes in legislation, the practice of the data protection supervisory authority, business needs, or newly discovered security risks.