

Privacy Notice for marketing-related activities

IDBC Creative Solutions Kft., **IDBC New Tech Kft.** and **IDBC GO Kft.** provide human resource management services as well as IT services related to business process management. Given that the target groups and business partners of the three companies differ, but the provision of services (searching for potential partners, assessing market needs, concluding contracts, performance, etc.) generally follows the same methodology, the three companies have entered into a joint controller agreement.

The essence of the joint controller agreement is that IDBC Creative Solutions Kft., IDBC New Tech Kft. and IDBC GO Kft. jointly perform and operate the provision of the services falling within their respective fields of activity and its operation (e.g. sales, client relations, assessment of market needs).

The preparation and up-to-date maintenance of the privacy notice concerning marketing activities (webinars, promotion, market research, social media, website cookies, etc.), the handling of any data protection incidents that may arise in connection with marketing activities and, where necessary, their notification to the data protection supervisory authority, as well as the exercise of data subjects' rights, are carried out with the involvement of **IDBC Creative Solutions Kft.** Where any data-protection-related activity (e.g. amendment of the privacy notice, communication with data subjects) affects the activities of IDBC New Tech Kft. and/or IDBC GO Kft., IDBC Creative Solutions Kft. acts after consultation with the Parties or the affected Party.

In the course of its business and marketing activities, IDBC Creative Solutions Kft., IDBC New Tech Kft. and IDBC GO Kft. (**hereinafter jointly: IDBC or Controller**) come into contact with natural persons, legal entities and organisations without legal personality. Legal entities and organisations without legal personality are referred to as “business partners”.

In this Privacy Notice, we have summarised the information (purpose, legal basis and duration of processing, categories of personal data processed, etc.) relating to the processing of personal data **in connection with the promotion of IDBC's business activities and IDBC's marketing-related tasks.**

Our privacy notice on the processing of personal data in connection with establishing contact with business partners, cooperating with our existing business partners, and IDBC's business activities in general can be found here: <https://idbc.hu/adatvedelem/>

Our privacy notice for candidates (job applicants) relating to cooperation for the purposes of job search and placement can be read here: <https://idbc.hu/adatvedelem/>

Persons working for IDBC (including our subcontractors) receive the notice on the processing of their personal data before signing their employment contract or subcontractor agreement.

Legislation relating to the processing and protection of personal data

- a) refers to the subject of the personal data (e.g. the natural person who comes into contact with IDBC, or the business partner's representative or contact person) as the data subject (hereinafter: data subject),
- b) refers to any information relating to, or capable of being linked to, the data subject as personal data,

- c) refers to any operation performed on personal data (collection, recording, storage, processing, retrieval, disclosure, querying, access, publication, etc.) as processing,
- d) refers to the authorisation for processing as the legal basis for processing,
- e) refers to the entity that determines the purposes and means of the processing as the controller,
- f) refers to those who do not belong to the controller but who, under a written agreement, participate in processing operations, as processors,
- g) and refers to a person other than the data subject, the controller and the processor as a third party; we therefore use these terms in this Privacy Notice.

This Privacy Notice also contains the data protection and remedy rights afforded to the data subject.

1. Identity and contact details of the Controllers

Controller 1: **IDBC Creative Solutions Kft.**

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Company registration number: 01-09-192925

Tax number: 24983332-2-41

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Data Protection Officer's contact details: adatvedelem@idbc.hu

Controller 2: **IDBC New Tech Kft.**

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Company registration number: 01-09-861417

Tax number: 13556075-2-41

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Data Protection Officer's contact details: adatvedelem@idbc.hu

Controller 3: **IDBC GO Kft.**

Registered seat and postal address: 1138 Budapest, Népfürdő u. 22., Duna Tower Office Building, Tower A, 13th floor

Registering authority: Company Registry Court of the Budapest-Capital Regional Court

Company registration number: 01-09-283268

Tax number: 25578182-2-41

E-mail address: info@idbc.hu

Phone number: +36 30 479 8090

Data Protection Officer's contact details: adatvedelem@idbc.hu

2. Key legislation applicable to the processing

- a) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR or General Data Protection Regulation)
- b) Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.)
- c) Act V of 2013 on the Civil Code (Ptk.)
- d) Act CVIII of 2001 on Certain Issues of Electronic Commercial Services and Services Related to the Information Society (E-Commerce Act)
- e) Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Commercial Advertising Activity (Advertising Act)
- f) Act XXV of 2023 on Complaints, Public Interest Disclosures, and the Rules Relating to the Reporting of Irregularities (Complaints Act)

3. Data processing activities

3.1. Registration for an online event

IDBC supports, in numerous ways, e.g. through online events (webinars, meetups, etc.), access to information for those interested in its business activities, and provides information on news, professional developments and other relevant matters.

A webinar or meetup is an online round-table discussion on a pre-announced topic with experts, or a knowledge-sharing event relating to a professional subject (hereinafter jointly: online event).

Participation in an online event is possible following registration on the idbc.hu website. Registration establishes a contractual-type relationship between IDBC and the registering natural person, the purpose of which is the processing of data relating to the online event (e.g. title, date, conditions of participation), ensuring and recording participation in the announced online event, identifying participants, and maintaining contact with participants.

Separate registration is required for each online event. During registration, the participant must provide their name, e-mail address, the name of the company they represent (optional), their position at the company they represent (optional), and their telephone number. Messages containing technical information (e.g. reminders of the date, the link to the online event) are sent to the registered e-mail address before and after the date of the online event.

The development of its services and the maintenance of relationships with its audience are important to IDBC; therefore, after the online event, it asks participants to complete a satisfaction survey, which is anonymous and not mandatory.

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

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

3.2. Requesting and downloading an e-book

IDBC also produces electronically downloadable professional publications (hereinafter: e-book) which explore various current topics of interest, present human resources professional questions

and answers, methodological or problem-solving options, or summarise business offers or company presentations.

Requesting and downloading an e-book requires the provision of a name and e-mail address; providing the name of the company represented by the data subject is optional. By providing their name and e-mail address, i.e. by requesting the e-book, a contractual-type relationship is established between IDBC and the natural person requesting the e-book, the purpose of which is to maintain records relating to the electronic professional publication (e.g. the subject of the requested e-book, identification of the requester, the date of the request), to fulfil the e-book request, and to maintain contact with the person requesting the e-book.

The development of its services and the maintenance of relationships with its audience are important to IDBC; therefore, after downloading the e-book, it may ask those requesting the e-book to complete a satisfaction survey, which is anonymous and not mandatory.

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

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

3.3. Newsletter, market research or public opinion polling

IDBC regularly (a few times a year) sends a newsletter to subscribers, informing them of news and developments related to its business activities, information about upcoming events (e.g. topic, date, follow-up), as well as reports and interesting facts about past events, and may occasionally conduct telephone or written public opinion or market research among newsletter subscribers on a topic of general interest.

Based on the information available to it (e.g. job role, area of interest) or conclusions drawn therefrom, IDBC carries out profiling (grouping according to certain characteristics) from time to time, and may send specific messages or thematic newsletters to different target groups, or carry out business or business-development outreach (e.g. surveying persons engaged in recruitment on human resource topics of interest to them).

Subscription to the newsletter takes place by providing a name, e-mail address, and optionally the job role and the name of the organisation represented, at the same time as registration for an online event (Section 3.1) or the request for an e-book.

Subscribing to the newsletter is not a condition for participating in an online event (Section 3.1), requesting an e-book (Section 3.2), or using IDBC's services; therefore, the newsletter subscriber may unsubscribe from the newsletter at any time via the link contained in it. Unsubscribing from the newsletter does not affect participation in an online event or the fulfilment of an e-book request.

It is also possible to unsubscribe from the newsletter by sending a request to adatvedelem@idbc.hu (see also Sections 8.3 and 8.4).

After unsubscribing from the newsletter, the data subject will no longer receive notifications about IDBC's latest offers, trends and developments in its field of activity, professional information, or reports on past online events, and will no longer take part in any market research or opinion polling.

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

Duration of processing: until withdrawal of the data subject's consent (see also Sections 8.3 and 8.4), or, in the absence thereof, 1 year from the last contact (e.g. newsletter)

3.4. Processing related to the exercise of the data subject's rights and to complaints concerning the processing of personal data

In connection with all processing activities carried out by IDBC, the data subject may exercise the rights set out in Section 8, may submit a complaint to the Controller regarding the processing of their personal data, or may exercise the remedies described in Section 9.

The rights of data subjects are personal rights, which may only be exercised in person. The expression “exercised in person” means that these rights may only be exercised by the person to whom the personal data or the data protection complaint relating to the exercise of that right relates.

The data subject's identification data (name, place and date of birth, mother's name) will only be processed in full where the data subject's right cannot be exercised, or the complaint concerning the processing cannot be assessed, without providing such data.

If the exercise of a data subject's right or a data protection complaint adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, IDBC is entitled to refuse compliance with the data subject's request, to the extent necessary and proportionate, or to provide a response of limited content.

If a problem relating to the processing of personal data can be linked to the activities of a party contributing to IDBC's business activities, that contributing party is responsible for handling the matter (see Chapter 6).

In the case of a data protection complaint or exercise of a data subject's right concerning processors (see Section 6.2), IDBC acts if the data protection complaint or exercise of the data subject's right concerns processing activities commissioned by IDBC. IDBC may involve the processor in investigating a data protection complaint or exercise of a data subject's right concerning processing activities commissioned by it, and for this purpose may transfer the data subject's personal data under this point to the processor, provided that this does not prejudice the rights and freedoms of the data subject. A data protection complaint or exercise of a data subject's right concerning an activity of the processor that falls outside the content of the contract concluded between the processor and IDBC shall take place directly with the processor.

In order to ensure the exercise of data subjects' rights and to handle data protection complaints (receipt, assessment, etc.), IDBC processes the data subject's personal data [name, data relating to the exercise of the data subject's right (subject matter, date, and data relating to compliance)].

Legal basis for processing: Article 6(1)(c) GDPR – compliance with the legal obligation under Article 12(5) and (6), Articles 15–18 and Article 21 of the GDPR

Retention period for personal data: 5 years from the fulfilment of the exercise of the data subject's right (closure of the matter) (the general limitation period)

If the enforcement of the data subject's rights or the handling of the data subject's complaint leads to administrative or judicial proceedings, the duration of processing under this point shall last until the expiry of the retention period applicable to the documents of those proceedings.

3.5. Use of website cookies

3.5.1. General information about cookies

When someone visits a website, small files known as “cookies” (hereinafter: cookie) are placed on their IT device (e.g. computer, laptop, tablet, mobile phone, hereinafter jointly: device), which can serve various purposes. Certain cookies, for example, allow the server to distinguish between users viewing the website at the same time, and may also store the activities and preferences of the website visitor, making it possible, for example, to retain the visitor's settings (username, chosen language, etc.) so that this information does not need to be re-entered the next time the user visits the site. Using cookies, the website owner (the controller) may also collect data about the visitor's device and activity (e.g. the type of browser and other browser data, the computer's operating system, IP address, the pages viewed by the user and the website functions used).

Some cookies are essential for the website to function properly, and without their use smooth operation of the website cannot be ensured; others collect information about the use of the website in order to make it even more convenient and useful.

Some cookies are only temporary and disappear when the browser session is closed, while others remain on the device for a longer period.

Persistent cookies, unlike session cookies, are stored on the visitor's device on a lasting basis and are therefore not automatically deleted when the browser is closed.

Different browsers allow the default cookie settings (acceptance) to be changed, so the user can prevent the automatic acceptance of cookies, or can set a deletion date. Further detailed information about the cookie settings of the following browsers can be found by clicking on the name:

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

Cookies may also be used to collect anonymised (non-identifying) statistical data, with the help of which the controller can gain insight into the browsing habits and user experience of its website visitors.

The controller may use its own cookies on the website; their purpose and function are determined by the controller itself, and third parties have no influence over them. The controller may also make use of cookies provided by third-party service providers. Third parties include, for example, providers of data-analytics services, who help the controller understand what content website visitors view and for how long, or which menu items or website functions they use, what interests them, etc. Based on this information, the controller can plan the direction and content of the development of its website and/or services, its customisable services, etc.

3.5.2. Necessary cookies

Necessary cookies enable browsing of IDBC's websites and the use of the website's functions. Without the use of these cookies, smooth use of the website cannot be ensured. A necessary cookie cannot, on its own, identify the person of the user visiting the website, and therefore does not allow individualised (person-linked) data storage.

Please note that the purpose of necessary cookies is to support and facilitate the usability and processes of the website; therefore, if the acceptance of necessary cookies is disabled, full use of all functions of the website cannot be guaranteed.

The necessary cookies listed in the table below do not collect individualised data that would allow identification of a person. The purposes of using necessary cookies are:

- a) developing and operating the website;
- b) facilitating the navigation of the website by the user visiting it;
- c) ensuring access to the website's functions.

Cookie name	Cookie type	Purpose of cookie (description)	Duration of processing
PHPSESSID	Strictly Necessary	Maintains the user's PHP session and enables essential website functionality during a browsing session.	Session
wp-wpml_current_language	Strictly Necessary	Stores the user's selected language to display the website in the preferred language.	1 day (or as configured by WPML)
GRECAPTCHA	Strictly Necessary	Used by Google reCAPTCHA to distinguish legitimate users from automated bots and protect forms against spam and abuse.	Up to 6 months
SIDCC	Third-Party / Security	Security cookie used by Google to protect user data and help maintain secure sessions.	Approximately 1 year
Secure-1PSIDCC	Third-Party / Security	Security cookie used by Google to authenticate users and protect against fraud and unauthorized access.	Approximately 1 year
Secure-3PSIDCC	Third-Party / Security	Security cookie used by Google to enhance browsing security and prevent fraudulent activity.	Approximately 1 year

3.5.3.Functional cookies

In order to create and maintain the user experience, IDBC uses information that allows unique identification of visitors to its websites to ensure the use of certain functions of the website.

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

Cookie name	Cookie type	Purpose of cookie (description)	Categories of data processed	Duration of processing
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_ga	Analytics	Distinguishes unique visitors and collects anonymous statistics about website usage.	Unique cookie identifier, browsing data, session information, device and usage data, truncated IP address, page visit events.	2 years
_ga_8M4C6V7LYR	Analytics	Stores session and event data for the website's Google Analytics 4 measurement ID.	Unique cookie identifier, session identifier, event data, browsing and usage data.	2 years
_gcl_a	Marketing	Used by Google Ads to measure ad conversions and improve advertising effectiveness.	Unique cookie identifier, advertising interaction data, conversion data, browsing data.	3 months
_fbp	Marketing	Used by Meta Pixel to identify visitors, measure conversions, and deliver personalized advertising.	Unique cookie identifier, browsing data, device information, pages visited, advertising interaction data.	3 months

3.6. Platform providers, social media

In order to promote its business activities and strengthen relationships with its audience, IDBC also makes use of the services of various platform providers (e.g. social media platforms). The fundamental aim of platform providers is to make the use of the platform “indispensable” for profit purposes; to this end, they create and maintain connections between participants, shape the user experience through various computer algorithms and design elements, and strengthen commitment to using the platform.

Platform providers are independent controllers, with their own terms of use and data protection and data security rules; however, depending on the technical/technological solutions applied by platform providers (e.g. data-collecting algorithms, machine-learning algorithms, language models) and the legislation applicable to them, it may occur that the platform provider and the controller qualify as joint controllers. In the case of joint controllership, the controller either acts alone or cooperates with the platform provider, depending on which processing operation needs to be carried out in respect of the given personal data.

For the purposes of this point, a data subject is any natural person (including employees) who views business or employer-related content published via a platform service used by IDBC (e.g. social media), who provides feedback on, reacts to (e.g. “likes”), or comments on announcements, offers, or IDBC's human resource management services or marketing activities published by IDBC, or who shares content or any post published by IDBC (e.g. an event invitation, a podcast, a short video) with others. Members of closed groups created by IDBC within the framework of the platform services it uses also qualify as data subjects.

The business-purpose interfaces provided by platform providers include numerous features (including computer algorithms collectively referred to as artificial intelligence) that the creator of a business or employer-purpose “fan page” (in this case, IDBC) may use, but which it has no ability to change. This includes, for example, which machine-learning or language-model solutions the

platform provider applies, what personal data it collects about users, and what cookies it uses to track (count, analyse the user behaviour of) visitors to the fan pages.

As operator of its business and fan pages (including closed groups), IDBC can generally access demographic data relating to its audience (e.g. composition by age, gender, marital status and professional situation), data relating to its audience's lifestyle and interests (including data on the online purchases of persons visiting its fan page), as well as geographic data that allows it to make the shared content more targeted and to decide where to offer special discounts or organise events. Given that the data groupings made available by the platform provider may in some cases be capable of identifying individuals, and that IDBC has no influence over the collection and analysis of such data, it is advisable for users (visitors to IDBC's fan page, members of closed groups) to set privacy permissions in their own personal profile created within the platform service that allow the sharing of information relating to their private sphere within the narrowest possible scope.

IDBC endeavours to use only statistical data provided by the platform provider – data that cannot be linked to a specific person – when analysing the data of its fan pages. Analysis of fan page data generally takes place for the purpose of developing the Controller's activities and successfully conducting its promotional campaigns.

Please note that joining any business or employer-purpose “fan page” created by IDBC on any platform service, or any closed group created by IDBC using any platform service, is not a condition for establishing or maintaining a business or employment relationship; in this respect, data subjects may act according to their own decision, taking into account the information set out in this chapter.

4. Profiling and automated decision-making

From among the personal data it processes, IDBC occasionally carries out profiling (grouping according to certain characteristics) based on conclusions drawn from the interests of persons registering for an online event, requesting an e-book or subscribing to the newsletter, the name of their employer or the organisation they represent (if provided by the data subject), and their job role, which it uses to determine the target audience for thematic newsletters and advertising campaigns. In connection with, or on the basis of, profiling, IDBC does not apply automated decision-making (a decision based solely on automated processing that affects the data subject).

5. Data security

IDBC takes technical, organisational and personnel measures to ensure that the personal data it processes are protected against, among other things, unauthorised access, unauthorised alteration and destruction.

Access to personal data stored in the IT system is role-based and logged, meaning that it is always possible to verify who accessed which personal data and when. Only IDBC's authorised and trained employees have access to the personal data processed, and only to the extent necessary for the performance of their job duties.

6. Access to data; contributors (e.g. processors)

IDBC engages business partners and other contributors for the purpose of pursuing its marketing activities (e.g. conducting online events, advertising campaigns) and for storing the personal data generated in the course thereof. Contributors may be controllers or processors.

In the case of platform providers and social media platforms (see Section 3.6), it may occur that the operating company qualifies as an independent controller (e.g. LinkedIn) or, as in the case of certain Meta/Facebook functions, as a joint controller together with IDBC. Independent controllers are responsible for their own processing and are therefore the competent party in respect of the activities they carry out. Where IDBC qualifies as a joint controller with the platform provider in connection with the use of a given platform, it is necessary to determine, on a case-by-case basis, which processing operations IDBC has influence over, and it is only in respect of those operations that data subjects' rights may be exercised through IDBC, or a complaint concerning the processing may be submitted to IDBC.

Where a contributing business partner may, under a mandate from IDBC, also access personal data and carry out one or more processing operations with it, it qualifies as a processor under the GDPR. A processor may not make decisions relating to processing; it is only entitled to act, in the processing of personal data, in accordance with the contract concluded with IDBC and the instructions received from it. IDBC only engages processors that guarantee, through appropriate technical and organisational measures, a level of data security appropriate to the degree of risk. The specific tasks and responsibilities of the processor are set out in the contract between IDBC and the processor.

6.1. Contributors engaged by IDBC that qualify as independent controllers:

- a) 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 the processing of personal data by Meta can be found here: Facebook – https://www.facebook.com/privacy/policy?section_id=13-HowToContactMeta; Instagram – <https://help.instagram.com/155833707900388>
- b) TikTok – operator: TikTok Technologies Limited, which currently has no European headquarters, but has published the following contact information in order to comply with the EU Digital Services Act: <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 information on the use of cookies can be found here: <https://www.tiktok.com/legal/page/global/cookie-policy/hu>
- c) LinkedIn (registered seat: 1000 W Maude, Sunnyvale, CA 94085, US); its privacy notice can be read here: LinkedIn Privacy Policy
IDBC actively uses LinkedIn's functions and features, which the data subject can influence through their own profile settings.

6.2. Contributors engaged by IDBC that qualify as processors:

- a) O365 and Microsoft Teams – operator: Microsoft Ireland Operations Limited (registered seat: Ireland, Dublin 18, Leopardstown, South County Business Park, One Microsoft Place; privacy notice: <https://privacy.microsoft.com/hu-hu/privacystatement>)

- b) ZOHO Campaigns module – operator: ZOHO Corporation Pvt. Ltd. (name and registered seat of European representative: Zoho Corporation B.V., Beneluxlaan 4B, 3527 HT Utrecht, The Netherlands; ZOHO privacy notice: <https://www.zoho.com/privacy.html>; data protection aspects of the ZOHO Campaigns module: <https://www.zoho.com/campaigns/gdpr/>)
- c) Google services – European representative of the operator: Google Ireland Limited (registered seat: Gordon House, Barrow Street, Dublin 4, Ireland; privacy notice: <https://policies.google.com/privacy?hl=hu&fg=1>)

7. Data transfer

IDBC may, on occasion, transfer personal data, in a documented manner and for a purpose and in a manner determined by legislation, for proceedings before the National Authority for Data Protection and Freedom of Information, which performs data protection supervision, or before another authority or court.

8. Data subjects' rights in connection with the processing

8.1. Right to request information, right of access

The data subject may, in writing, via the contact details provided in Section 1, request information from IDBC on which of their personal data are processed, on what legal basis, for what processing purpose, from what source, and for how long, as well as to whom, when and on the basis of which legislation the Controller has granted access to, or to whom it has transferred, which of the data subject's personal data.

Where the data subject requests such information in multiple copies, the Controller is entitled to charge a reasonable fee, commensurate with the administrative costs of producing the additional copies.

IDBC complies with the data subject's request within a maximum of one month, by a reply sent to the contact details provided by the data subject.

8.2. Right to rectification

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

The Controller complies with the request within a maximum of one month and notifies the data subject thereof by letter sent to the contact details provided by them.

IDBC informs those to whom it has transferred the data subject's personal data of the rectified data, provided that doing so is not impossible or does not require disproportionate effort on the part of the Controller.

8.3. Right to withdraw consent to processing

The data subject may withdraw their consent to processing at any time; this shall not affect the lawfulness of processing based on consent prior to its withdrawal. Where consent to processing is necessary for the conduct of an event in which the data subject wishes to participate, but the data subject withdraws their consent to processing, the data subject may not participate in the event following the withdrawal of their consent to processing.

8.4. Right to erasure

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC erase all or some of their personal data, provided that one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or processed;
- b) the data subject withdraws their consent to processing and there is no other legal basis for the processing;
- c) the data subject objects to the processing of their personal data carried out on the legal basis of legitimate interest or for direct marketing purposes (including profiling to the extent it relates to 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 under Member State or Union law to which the controller is subject;
- f) the personal data were collected in connection with the offer of information society services referred to in Article 8(1) of the GDPR (services offered to children).

IDBC will not comply with the erasure request if the 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 under Member State or Union law to which the controller is subject, or
- c) for reasons of public interest in the area of public health, where the processing is carried out by, or under the responsibility of, a person subject to professional secrecy, or
- d) for the establishment, exercise or defence of legal claims, or
- e) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, insofar as erasure of the personal data would be likely to render impossible or seriously impair the achievement of those purposes.

IDBC will process the data subject's erasure request within a maximum of one month and will notify the data subject of the outcome by letter sent to the contact details provided by them.

IDBC informs those to whom it has previously transferred the data subject's personal data of the erasure of the personal data, provided that doing so is not impossible or does not require disproportionate effort on the part of the Controller.

8.5. Right to restriction of processing (blocking)

The data subject may, in writing, via the contact details provided in Section 1, request that IDBC process their personal data in a restricted manner (block it).

Restriction is carried out by clearly marking the restricted nature of the processing and storing the data separately from other data. This means that no processing operation other than storage may be carried out on the data. The restriction lasts for as long as the reason indicated by the data subject makes it necessary to keep the personal data under restricted storage.

A data subject may, for example, request restriction of their personal data if they believe that IDBC has processed their personal data unlawfully, but administrative or judicial proceedings initiated by them require that the Controller not erase the personal data. In such a case, IDBC keeps the personal data under restriction until the authority or court has been approached, and, following the conclusion of the administrative or judicial proceedings, either erases the data or continues processing it.

8.6. Right to object

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

IDBC examines the data subject's objection within a maximum of one month and notifies the data subject of the outcome (including, where applicable, a communication regarding the deletion of any unlawfully processed personal data) by letter sent to the contact details provided by them.

9. Means of enforcing rights and remedies in connection with the processing

The data subject may contact IDBC via the contact details indicated in Section 1 in order to enforce their rights relating to the processing and protection of their personal data.

If the data subject believes that their rights relating to the protection of their personal data have been infringed, they may seek a remedy from the following authority:

National Authority for Data Protection and Freedom of Information (NAIH)
 registered seat: 1055 Budapest, Falk Miksa u. 9-11.
 postal address: 1363 Budapest, P.O. Box 9.
 telephone: +36 (1) 391-1400
 website: www.naih.hu
 e-mail: ugyfelszolgalat@naih.hu

If the data subject experiences unlawful processing of their personal data, they may initiate court proceedings (a civil action) against the Controller. Jurisdiction to hear the action lies with the regional court (törvényszék). At the data subject's choice, the action may also be brought before the regional court having jurisdiction over the data subject's place of residence (the contact details of the regional courts can be viewed via the following link: <https://birosag.hu/torvenyszekek>)

10. Updating and availability of the Privacy Notice

IDBC reserves the right to unilaterally amend this Privacy Notice. This Privacy Notice may be amended in particular where necessary due to a change in legislation, the practice of the data protection supervisory authority, business needs, or a newly identified security risk.