

**THE NETHERLANDS-HUNGARIAN CHAMBER OF COMMERCE IN BUDAPEST
DATA PROTECTION NOTICE TO INDIVIDUALS**

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1. GENERAL INFORMATION

The Netherlands-Hungarian Chamber of Commerce in Budapest (“Dutcham”) is processing information concerning third parties, contact persons of its contracting partners, suppliers and other individuals (“**individuals**”) whose information qualifies as “personal data” as defined in point 1, Art. 4 of the EU General Data Protection Regulation No 2016/679 (“**GDPR**”).

This Data Protection Notice (the “**Notice**”) provides information regarding the processing of personal data and the rights and remedies of the individuals.

Contact details of Dutcham:

Registered seat: H-1124 Budapest, Csörsz utca 41.

Telephone number: + 36 1 886 92 52

Email: info@dutcham.hu

Website: <http://www.dutcham.hu>

2. UPDATES AND AVAILABILITY

Dutcham reserves the right to modify this Notice unilaterally with effect subsequent to such modification, subject to the limitations provided for in law and with advance notification to the individuals in due time, if necessary. Dutcham may modify this Notice especially if it is required on changes in the law, the practice of the data protection authority, business needs, any new activity involving personal data processing or any newly revealed security exposures, or if it is necessary because of individuals’ feedback. When communicating regarding this Notice or privacy issues or otherwise keeping in contact with individuals,

Dutcham may use the available contact details of individuals to contact or keep in contact with them. On request, Dutcham will send a copy of the latest updated version of this Notice to individuals or certify that the individuals have read the Notice.

3. **SPECIFIC DATA PROTECTION TERMS**

In certain cases, specific privacy-related terms and conditions may also be applicable (e.g. cookies used on Dutcham's website).

4. **SCOPE OF THE DATA AND THE PURPOSE OF THEIR PROCESSING**

The table below describes the scope of the personal data, the purpose of their processing, the legal basis for their processing, the duration of the processing and the scope of the persons authorised to access the data. Where a data processing operation is required for its legitimate interest, Dutcham will make available the balancing test of the underlying interests on a request to Dutcham via its contact details above.

Dutcham wishes to draw the individuals' attention to their right to object, on grounds relating to their particular situation, at any time to the processing of their personal data which is based on legitimate interests pursued by Dutcham or by a third party, including profiling. Dutcham shall no longer process the personal data unless Dutcham demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, the individual shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the individual objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Where this Notice indicates the relevant limitation period as the duration of data storage, any event that interrupts this limitation period shall extend the term of the data processing until the new date when the underlying claim may lapse.

Purpose of the processing	Legal basis for the processing	Scope of the processed data	Duration of storage, access rights, data transfers
<p>Online event registration on Dutcham’s website.</p>	<p>If the registrant is acting in his/her own name registers (e.g. a private entrepreneur): Art. 6 1. a) of the GDPR (voluntary consent of the individual).</p> <p>The individual may withdraw his/her consent at any time. Such withdrawal will not affect the legitimacy of the data processing carried out before the withdrawal.</p> <p>Without consent, the individual cannot register for events.</p> <p>If the registrant is acting as an employee, executive or contact person of another organisation: Art. 6 1. f) of the GDPR. The legitimate interests of both Dutcham and the registering organisation to contribute to Dutcham events, to expand business networks and listen to/take part in professional events.</p> <p>During registration, individuals may separately consent to receiving marketing materials from</p>	<p>First name, last name, job title, contact email, company name, billing address, VAT number, phone number and any other remarks from the individual/registering organisation, fact of payment before the event (if the participation fee concerning an event is not transferred in advance, i.e. does not arrive before the event, the participant must pay the fee in cash on the spot).</p>	<p>If an individual acting in his/her own name withdraws his/her consent, Dutcham will delete his/her personal data.</p> <p>Otherwise, the data retention period is as follows:</p> <p>Five years after the (last) day of the event (Section 6:22 (1) of the Act V of 2013 on the Civil Code (the “Hungarian Civil Code”)—civil law claims lapse after five years).</p> <p>Tax obligations regarding the event: duration of data storage is five years from the last date of the calendar year in which the tax concerned should have been declared or reported or, in the absence of such a declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of the Act CL of 2017 on the Taxation Procedure (the “Hungarian Taxation Act”).</p> <p>Accounting documents: duration of data storage is eight years (Sections 168–169 of the Act C of 2000 on Accounting (the “Hungarian Accounting Act”), including data in accounts, contract documents, orders and invoices.</p>

	<p>the event organisers (including Dutcham).</p>		<p>Authorised persons who have access to the data in Dutcham: Executive, Office assistant.</p> <p>If the registering organisation or the individual acting in his/her own name allows it, the data given by him/her at registration may be shared with the possible other organisers / co-organisers, as well as the other participants of the event for event organisation and business development purposes (i.e. to avoid sending invitations for the same event to the same persons and to communicate and send information concerning the event, as well as building business and professional relationships between participants).</p>
<p>Sending newsletters by email.</p> <p>Dutcham's regular online newsletter contains information about events, news for members, business reports, embassy news and business offers from members.</p>	<p>If the individual subscribes to the newsletter in his/her own name (e.g. a private entrepreneur) Art. 6 (1) a) of the GDPR (voluntary consent of the individual) and Section 6 (1) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (prior, clear and express consent of the individual).</p> <p>The individual may withdraw his/her consent at any time. Such withdrawal will not affect the legitimacy of the data processing carried out before the withdrawal.</p>	<p>First name, last name and email address of the potential recipients, company name, job title, marketing preferences (monthly newsletter/event invitations/promotional campaigns).</p>	<p>If the recipient withdraws consent or unsubscribes from the newsletters, Dutcham will delete the data.</p> <p>Authorised persons who have access to the data within Dutcham: Executive, Office assistant.</p>

	<p>Without consent, Dutcham cannot send newsletters to the individual concerned.</p> <p>If the individual subscribes to the newsletter as an employee, executive or contact person of another organisation: Art. 6 1. f) of the GDPR. The legitimate interests of Dutcham, Dutcham members and the registering (subscribing) organisation: sending and receiving newsletters containing information on Dutcham and other events, news for members, business reports, embassy news and business offers from members.</p> <p>During subscription, individuals may separately choose (consent) to receiving business offers from members.</p>		
<p>Taking photos or filming videos at Dutcham’s events and their further usage.</p>	<p>Art. 6 1. a) of the GDPR and Art. 2:48. § (1) of the Hungarian Civil Code (voluntary consent of the individual).</p> <p>The individual may withdraw his/her consent at any time. Such withdrawal will not affect the legitimacy of the data processing carried out before the withdrawal.</p>	<p>Photos and videos which Dutcham takes and films at its events (portraits and sound recordings of individuals). With the consent of the individuals, the co-organisers of the event may publish the photos or videos on their website and other third parties (e.g. news agencies) may also publish them</p>	<p>Dutcham deletes the recordings at the request of the individual concerned.</p> <p>Authorised persons who have access to the data within Dutcham: Executive, Office assistant.</p> <p>The materials may appear publicly on the website of Dutcham, on other websites or in other media.</p>

	<p>Without the consent of the individual, Dutcham cannot make and use recordings.</p> <p>No consent is needed in cases where Dutcham makes and uses photos or videos of public performances (e.g. public speeches), or on a mass of persons (Art. 2:48 (2) of the Hungarian Civil Code). In such cases, the legal basis for processing is Art. 6 1. f) of the GDPR, the legitimate interests of Dutcham): providing information on Dutcham's activities and promoting the success of the events.</p>	<p>(e.g. in newspapers or on social media).</p>	<p>Dutcham deletes the recordings and media materials containing photos or videos of the individual anytime if the individual requests so. It is worth noting that once such recordings/materials become public, third parties may save the published recordings and media materials and/or copy them.</p>
<p>Sending invitations to events organised by Dutcham.</p>	<p>Art. 6 1. f) of the GDPR (data processing is needed for pursuing the legitimate interests of Dutcham).</p> <p>The legitimate interest: successful and efficient organisation of events.</p>	<p>Contact details of the invitees: the names of the invitees and the organisations they represent and other data they may provide concerning their participation (e.g. anticipated time of arrival, preferred presentation or other event).</p>	<p>Unless the individual/organisation objects to the processing of data, Dutcham can use the contact details also after the event for sending out invitations to events organised by Dutcham or to other social or professional meetings. Dutcham stores the data for five years after the last contact made with the individual/organisation (Section 6:22 (1) of the Hungarian Civil Code—civil law claims lapse after five years).</p> <p>Authorised persons who have access to the data within Dutcham: Executive, Office assistant.</p>

<p>Processing the personal data of contact persons, executives representing contracting partners and involved in contract performance/verification of performance, i.e. the day-to-day implementation of contracts). This includes the processing of the postal addresses of contact persons, their payment instructions and the sending of official notifications through the contact details and information regarding contractual obligations to be fulfilled.</p> <p>This also includes processing data of Dutcham members (including their contact persons) and persons/entities applying as members</p>	<p>It depends whether the contract is concluded with the individual (e.g. a private entrepreneur) or with other undertakings; it is Art. 6 1. b) of the GDPR where the contract has been concluded directly with the individual and the purpose is the implementation of the contract, or it is Art. 6 1. f) of the GDPR – pursuing the legitimate interests of both Dutcham and those of the contracting partner: fulfilling the obligations, exercising the contractual rights and synchronising cooperation between the contracting parties.</p> <p>The exchange of personal data is required under the contract; without them, Dutcham is unable to conclude the contract or implement it.</p>	<p>The contact details (email addresses, telephone numbers, mobile phone numbers, telefax numbers) of the contact persons, executives representing the contracting partners and/or involved in contract performance/verification, and any other activity or communication between the contracting parties, which includes all personal data (e.g. communication received from a contact person or any other person acting on behalf of a contracting partner).</p> <p>The personal data are either provided to Dutcham by the contracting partner or the individuals themselves.</p> <p>As regards members and applicants, Dutcham processes data for keeping in contact with such members and applicants, billing and managing membership, which especially concerns the following data: membership type, company name/name of personal member and its sector, contact person's name, job title and e-mail address as well as his/her position, website, mailing address, invoicing</p>	<p>Five years after the date when the contractual relation ceased (Section 6:22 (1) of the Hungarian Civil Code—civil law claims lapse after five years).</p> <p>Tax obligations: duration of data storage is five years from the last date of the calendar year in which the tax concerned should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of the Hungarian Taxation Act).</p> <p>Accounting documents: duration of data storage is eight years (Sections 168–169 of the Hungarian Accounting Act), including the data in documents which support the accounts, e.g. data in contract documents between Dutcham and the counterparty (such as an order) or on an invoice.</p> <p>Authorised persons who have access to the data within Dutcham: Executive, Office assistant.</p>
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Processing the personal data of contact persons, executives representing contracting partners and involved in contract performance/verification of the performance concerning compliance issues or any other activity needed to enforce contract performance including seeking remedies to enforce the rights under the contracts.	<p>The legal basis of processing data is the legitimate interest of Dutcham (Art. 6 1.f of the GDPR).</p> <p>The legitimate interest: handling compliance issues or any other activity needed to enforce contract performance including seeking remedies to enforce the rights arising from the contracts.</p>	<p>The contact details (email addresses, telephone numbers, mobile phone numbers, telefax numbers) of the contact persons, executives representing the contracting partners and/or involved in contract performance/verification of performance, and any other activity of or communication between the contracting parties which includes any kind of personal data (e.g. communication received from a contact person or any other person acting on behalf of a contracting partner).</p> <p>The personal data are either provided to Dutcham by the contracting partner, or the individuals themselves.</p>	<p>Five years after the date when the contractual relation ceased (Section 6:22 (1) of the Hungarian Civil Code—civil law claims lapse after five years).</p> <p>Tax obligations: duration of data storage is five years from the last date of the calendar year in which the tax concerned should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of the Hungarian Taxation Act).</p> <p>Accounting documents: duration of data storage is eight years (Sections 168–169 of the Hungarian Accounting Act). For example, the data that are included in documents which support the accounts or data in contract documents between Dutcham and the counterparty (such as an order) or on an invoice.</p> <p>Authorised persons who have access to the data within Dutcham: Executive, Office assistant.</p>
Handling requests received by Dutcham.	Art. 6 1. f) of the GDPR (data processing is needed to pursue the legitimate interests of Dutcham)	The personal data regarding the requests, the contact details of individuals (names, addresses, email addresses, telephone	Five years after responding to the given request (Section 6:22 (1) of the Hungarian Civil Code—civil law claims lapse after five years).

	The legitimate interests: handling requests and responding to inquiries.	numbers) and the records of the actions taken regarding the request.	Authorised persons who have access to the data within Dutcham: Executive, Office assistant.
Processing the business cards of contact persons.	<p>Art. 6 1. a) of the GDPR (voluntary consent of the contact person).</p> <p>The individual may withdraw his/her consent at any time. Such withdrawal will not affect the legitimacy of the data processing carried out before the withdrawal.</p> <p>Dutcham cannot process business cards without the consent of the contact person.</p>	The business card and the contact data (e.g. name, job title, company name and further contact details of the individual).	<p>Dutcham will destroy a business card at any time on the request of the contact person.</p> <p>Authorised persons having access to the data within Dutcham: Executive, Office assistant.</p>

5. DATA PROCESSORS

The contracting partners engaged by Dutcham to carry out tasks related to data processing operations are listed below. Such contracting parties act as “data processors”, i.e. they process the personal data defined in this Notice on behalf of Dutcham.

Dutcham only uses data processors that provide sufficient guarantees, in particular in terms of expert knowledge, reliability and resources, to implement technical and organisational measures that meet the requirements of the GDPR, including a sufficient level of data security. The tasks and liabilities of the data processor are stipulated in the data processing agreement entered into between Dutcham and the data processor. After completing the processing on behalf of Dutcham, the processor will, on Dutcham’s decision, return or delete the personal data, unless there is a requirement to store the personal data under EU or Member State law to which the processor is subject.

Data processor	Activities and the personal data
<p>Webpartners Media Group Kft. 7624, Pécs, Bálicsi út 27/d, 5. AJTÓ Email: webpartners@webpartners.hu Webpage: www.webpartners.hu Tel: +36 30 474-3291</p>	<p>Activity: website management, development, online registrations for events, domain hosting, email service.</p> <p>It may access the following data (regarding event registration forms): first name, last name, job title, contact email, company name, billing address, phone number of registrants/attendants of Dutcham’s events.</p>
<p>KBOSS.hu Kft. 1031 Budapest, Záhony utca 7. Email: si@kboss.hu Tel: +36 30 354 4789</p>	<p>Activity: invoicing software provider.</p> <p>It may access the following data: name, mobile phone number, email address of contact persons acting in the name of Dutcham’s (potential) partners/members or in their own name (e.g. private entrepreneurs).</p>
<p>Yamdruk Informatika Kft. 1132 Budapest, Visegrádi utca 58/B. Email: info@yamdruk.hu</p>	<p>Activity: IT maintenance.</p> <p>It may access the following data: name, mobile phone number, email address of contact persons acting in the name of Dutcham’s (potential) partners/members or in their own name (e.g. private entrepreneurs).</p>
<p>MailChimp Attn. Privacy Officer</p>	<p>Activity: sign-up for online newsletter, sending online invitations.</p>

<p>privacy@mailchimp.com 675 Ponce de Leon Ave NE, Suite 5000 Atlanta, GA 30308 USA</p>	<p>It may access the following data: name, email address, phone number, workplace, job title of persons subscribing to Dutcham's newsletter, as well as persons open to receive online invitations from Dutcham.</p> <p>While providing the services, personal data may be processed in countries outside the EU that do not have the same level of data protection as under the GDPR. MailChimp participates in the EU-US Privacy Shield Framework regarding the collection, use and retention of personal information from EU member countries, which guarantees an adequate level of data protection concerning its processing activities. Further information: https://mailchimp.com/legal/privacy/ and https://mailchimp.com/help/about-mailchimp-the-eu-swiss-privacy-shield-and-the-gdpr/</p>
<p>DBH Finance Kft. 4025 Debrecen, Arany János u. 55. Email: legal@dbh-group.com</p>	<p>Activity: payroll and accounting service.</p> <p>It may access the following data: guest list (name and attendance) of attendants of Dutcham's events.</p>
<p>Colling Kft. 1134 Budapest, Váci út 49. Webpage: www.colling.hu</p>	<p>Activity: payroll and accounting service.</p> <p>It may access the following data: guest list (name and attendance) of attendants of Dutcham's events.</p>
<p>Google Ireland Limited Gordon House Barrow Street, Dublin 4 Ireland</p>	<p>Activity: mailing server and cloud storage service</p> <p>It may access the following data: business contact data of contact persons acting in the name of Dutcham's (potential) partners/members or in their own name (e.g. private entrepreneurs)</p>
<p>Insightly Inc. 680 Folsom St., Suite 550, San Francisco, CA 94107 USA Webpage: www.insightly.com</p>	<p>Activity: support and provision of online cloud-based CRM system (Insightly) for storing contact data, which includes the first name, last name, job title, company name, address (only relevant for individuals)</p>

	<p>acting in their own name), phone number, e-mail address of the individual.</p> <p>While providing the services, personal data may be processed in countries outside the EU that do not have the same level of data protection as under the GDPR. Insightly Inc. participates in the EU-US Privacy Shield Framework regarding the collection, use and retention of personal information from EU member countries, which guarantees an adequate level of data protection concerning its processing activities. Further information: https://www.insightly.com/privacy-policy https://www.privacyshield.gov/participant?id=a2zt00000004EW0AAM&status=Active</p> <p>It may access the following data: business contact data of contact persons acting in the name of Dutcham's (potential) partners/members or in their own name (e.g. private entrepreneurs).</p>
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6. DATA TRANSFERS TO OTHER DATA CONTROLLERS

These recipient(s) of data act as independent data controllers in accordance with their own terms and conditions of data processing, and Dutcham has no control over this. Individuals may obtain more detailed information from these companies about their data processing.

Recipient of data transfer	Activities and the personal data
K&H Bank Zrt. 1095 Budapest, Lechner Ödön fasor 9. Email: bank@kh.hu Webpage: www.kh.hu Tel: +36 1 328 9000	Activity: banking services. It may access the following data: board members' name, personal ID number, date and place of birth, mother's maiden name, address ID card, address.
Facebook Ireland Limited 4 Grand Canal Square, Grand Canal Harbour Dublin 2, Írország Adószám: IE9692928F	Activity: digital marketing, which includes posting news, articles about member companies, bilateral relations, art and culture of the Netherlands and/or Hungary on Dutcham's Facebook page. This can also include paid posts and accessing the Facebook page of persons liking Dutcham's posts or page (e.g. to thank the support of the individual). It may access the following data: name, e-mail address.

7. TECHNICAL AND ORGANISATIONAL DATA SECURITY MEASURES

Dutcham protects the personal data it processes primarily by restricting access to the information and by the unambiguous regulation of the rights to use it. Only such persons may have access to the systems and instruments used for processing the personal data referred to in this Notice whose access is required to fulfil the above-mentioned purposes and who are authorised to exercise such access. These persons include designated team members or departments, e.g. to user data that are required for the use of the Company's IT systems, to which the IT Department is authorised to have access.

Dutcham ensures the safe and legitimate use of the devices which it makes available (including company-owned computers, laptops and mobile phones), email boxes and the internet from such company-owned devices and the desirable level of consciousness of the employees related to such use by applying the following measures:

- Dutcham expects that the devices which it made available and which have access to the Internet as well as the email boxes are used by the employees with specific usernames and passwords, adequately complex and up-dated at regular intervals. Passwords are minimum characters,

including upper-case letters, lower-case letters, numbers, and special characters and any other possible measures concerning password usage. Passwords and usernames, as well as further technical solutions are required and applied with regard to the technical specifications and requirements of the concerning software and hardware devices.

- Besides the above, Dutcham protects all its systems and devices with fire walls, antivirus software and spam filters, and Dutcham makes available safe wired and wireless network access for all devices.
- Remote access to the systems and software of Dutcham for any device is possible only through safe connection (VPN) by using specific usernames and passwords, with the mitigation of the possibility of accidental access, including illegitimate access with the use of stolen or lost devices.
- Yamdrok Informatika Kft, as the contracted IT company of Dutcham, carries out regular software and system up-dates and back-up saves of data in accordance with its own internal regulations.

Regarding the physical protection of data and electronic documents, Dutcham stores offline folders in locked storage board.

8. DATA PROTECTION RIGHTS AND REMEDIES

8.1 Data protection rights and remedies

The detailed rights and remedies of the individuals are set forth in the applicable provisions of the GDPR (especially in Arts. 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82 of the GDPR). The summary set out below describes the most important provisions and Dutcham provides information for the individuals in accordance with the above articles about their rights and remedies related to the processing of personal data.

The information shall be provided in writing or by other means, including where appropriate by electronic means. When requested, information may also be provided orally if the identity of the individual is proven by other means.

Dutcham shall provide information on actions taken on a request concerning the below specified data subject (individual's) rights (see Arts. 15-22 of the GDPR) without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, considering the complexity and number of the requests. Dutcham shall inform the individual of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the individual makes the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the individual.

If Dutcham does not take action at the request of the individual, it shall inform the individual without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

8.2 The individual's right of access

- (1) The individual has the right to obtain confirmation from Dutcham whether personal data concerning him/her are being processed. Where they are, he/she is entitled to access the personal data concerned and the following information:

- a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed including especially recipients in third countries and international organisations;
 - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - e) the right of the individual to request from Dutcham rectification or erasure of personal data or restriction of processing of personal data concerning the individual or to object to such processing;
 - f) the right to lodge a complaint with a supervisory authority;
 - g) where the personal data are not collected from the individual, any available information as to their source.
- (2) Where personal data are forwarded to a third country, the individual is entitled to obtain information concerning the adequate guarantees of the data transfer.
- (3) Dutcham provides a copy of the personal data undergoing processing to the individual. Dutcham may charge a reasonable fee based on administrative costs for requested further copies. Where the individual submits his/her request in electronic form, the response will be provided to him/her by widely used electronic means unless the individual requests otherwise.

8.3 Right to rectification

The individual has the right to request that Dutcham rectify inaccurate personal data which concern him/her without undue delay. In addition, the individual is also entitled to have incomplete personal data completed, e.g. by a supplementary statement or otherwise.

8.4 Right to erasure (“right to be forgotten”)

- (1) The individual has the right that when he/she so requests, Dutcham must erase the personal data concerning him/her without delay where one of the following grounds applies:
- a) the personal data are no longer necessary regarding the purposes for which they were collected or otherwise processed;
 - b) the individual withdraws the consent on which the processing is based, and no other legal grounds exist for the processing;
 - c) the individual objects to the processing 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 to comply with a legal obligation in Union or Member State law to which Dutcham is subject;
 - f) the collection of the personal data occurred concerning offering services regarding the information society.
- (2) If Dutcham makes the personal data public and then it becomes obliged to delete it as aforesaid, then it will, given the available technology and the costs of implementation, take reasonable steps including technical steps to inform processors who carry out processing that the individual has insisted that the links leading to the personal data concerned or the copies or reproductions of these be deleted.

- (3) Paragraphs (1) and (2) shall not apply to the extent that processing is necessary, among other things, for:
- a) exercising the right of freedom of expression and information;
 - b) compliance with a legal obligation which requires processing by Union or Member State law to which Dutcham is subject;
 - c) archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
 - d) the establishment, exercise or defence of legal claims.

8.5 Right to restriction of processing

- (1) The individual has the right to obtain a restriction on processing from Dutcham where one of the following applies:
- a) the individual contests the accuracy of the data, for a period enabling Dutcham to verify the accuracy of the personal data;
 - b) the processing is unlawful and the individual opposes the erasure of the personal data, and requests the restriction of their use instead;
 - c) Dutcham no longer needs the personal data for processing, but the individual requires them for the establishment, exercise or defence of legal claims;
 - d) the individual has objected to processing based on the legitimate interest of Dutcham pending the verification whether the legitimate grounds of Dutcham override those of the individual.
- (2) Where processing has been restricted under paragraph (1), such personal data shall, except for storage, only be processed with consent of the individual or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal entity or for reasons of important public interest of the Union or of a Member State.
- (3) Dutcham informs the individual whose request has served as grounds for the restriction based on the aforesaid, before the restriction of processing is lifted.

8.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing

Dutcham will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Dutcham will inform the individual about those recipients if he/she so requests.

8.7 Right to data portability

The individual has the right to receive the personal data concerning him/her, which he/she has provided to Dutcham in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Dutcham, where the processing is based on consent or on a contract; and the processing is carried out by automated means.

In exercising the right to data portability pursuant to paragraph 1, the individual shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Exercising the aforesaid right shall not contravene to provisions concerning the right to erasure (“right to be forgotten”) and, further, this right shall not harm the rights and freedoms of others.

8.8 Right to object

- (1) The individual has the right to object, on grounds relating to his/her situation, at any time to the processing of personal data concerning him/her which is based on legitimate interests pursued by Dutcham or by a third party, including profiling. Dutcham shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual or for the establishment, exercise or defence of legal claims.**
- (1) Where personal data are processed for direct marketing purposes, the individual shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.**
- (2) Where the individual objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.**

8.9 Right to lodge a complaint with a supervisory authority

The individual has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if he/she considers that the processing of personal data relating to him/her infringes the GDPR. For the list and contact details of the supervisory authorities in Europe, please see: https://edpb.europa.eu/about-edpb/board/members_en. In Hungary, the competent supervisory authority is the Hungarian National Authority for Data Protection and Freedom of Information (in Hungarian: “*Nemzeti Adatvédelmi és Információszabadság Hatóság*”; <http://naih.hu>); address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.; postal address: 1530 Budapest, Pf.: 5; telephone: +36-1-391-1400; fax: +36-1-391-1410; email: ugyfelszolgalat@naih.hu).

8.10 Right to an effective judicial remedy against a supervisory authority

- (1) The individual has the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning him/her.
- (2) The individual has the right to an effective judicial remedy where the competent supervisory authority does not handle a complaint or does not inform him/her within three months on the progress or outcome of the complaint lodged.
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

8.11 Right to an effective judicial remedy against Dutcham or the processor

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Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, each individual has the right to an effective judicial remedy where he/she considers that his/her rights under the GDPR have been infringed as a result of the processing of his/her personal data in non-compliance with the GDPR.

Proceedings against Dutcham or a processor shall be brought before the courts of the Member State where Dutcham or the processor has an establishment. In Hungary, such proceedings fall under the jurisdiction of the competent tribunal (*törvényszék*). The individual can choose to initiate proceedings before a tribunal that has competence in the territory of the individual's permanent address or place of residence. Alternatively, such proceedings may be brought before the courts of the Member State where the individual has habitual residence. Information on the competent courts (tribunals) is available at www.birosag.hu.