

Case number: NAIH / 2019/13/11.

Subject: Partial decision granting the application and
order in the event of a time limit being exceeded

The National Data Protection and Freedom of Information Authority (hereinafter referred to as the Authority) [...] hereinafter referred to as the "Applicant") concerning the unlawful processing of personal data a Government Office of the Capital City of Budapest III. With the District Office (1033 Budapest, Mozaik utca 5 .; a hereinafter: Applicant I.) and the Zalaegerszeg District Office of the Zala County Government Office (8900 Zalaegerszeg, Zrínyi utca 101/A .; hereinafter: the Applicant II.) (Hereinafter together: Applicants) will take the following decisions.

I.1. The Authority shall decide on the applicant
grant his application in part and

(a) declare that, in breach of the principles of 'purpose-based' and 'data-saving',
made the Applicant's personal data available to third parties, and

(b) finds that Annex II in breach of the principles of "purpose limitation" and "data saving"
forwarded the Applicant's personal data to the Applicant I.

I.2. In its decision, the Authority shall request the Applicant to establish that the
Applicant II. unlawful processing of personal data also with regard to personal data

Forwarded from the e-mail address jarmu@zalagov.hu to the e-mail address turnover-buda@bfkh.gov.hu
also violated the principle of "integrity and confidentiality" of the General Data Protection Regulation
rejects.

There is no administrative remedy against this decision, but it has been available since its notification

Within 30 days, an action brought before the Metropolitan Court may be challenged in an administrative lawsuit. THE

the application shall be submitted to the Authority, by electronic means, which shall forward it together with the file
to the court. The request for a hearing must be indicated in the application. The whole personal

for those who do not benefit from an exemption, the fee for the court review procedure is HUF 30,000;

subject to the right to record material duty. Legal representation is mandatory in proceedings before the Metropolitan Court.

The Authority shall at the same time order the application of this Decision in accordance with Annex I and Annex II. identifier on the Authority's website.

II. In view of the fact that it exceeded the administrative deadline, the Authority exceeded HUF 10,000, ie HUF 10,000 pay the Applicant, by choice, by bank transfer or postal order.

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A II. There is no place for an independent appeal against the order under point 1, only on the merits of the case may be challenged in an appeal against a decision taken.

EXPLANATORY STATEMENT

I. Procedure and clarification of the facts

In its submission received by the Authority on 20 December 2018, the Applicant stated that that the Applicant is pursuing proceedings against his employer (hereinafter: the Employer) under number [...]. The During the proceedings, the representative of the Employer exercised the right of the Employer to inspect the documents. The Applicant a

He learned from his employer that the Applicant I and the Applicant II. against the Employer during the proceedings, the Applicant forwarded the documents containing personal data to each other, thus, according to the Applicant, third parties could have had unauthorized access to the personal data, including acting on behalf of the Employer during access to the file person.

According to the documents attached by the Applicant, the Applicant I. is the administrative activity carried out by him in an official procedure by e-mail to Applicant II in order to request information on the activities of the legal person under its control during the previous two years final decisions taken against him in the case of roadside checks. The Requested II. fulfilled Applicant I's request and sent it by e-mail to the inspected legal entity a copy of its decisions, including the Applicant's personal data (name and address) contained. Applicant II. forwarded a copy of the following documents to Applicant I: Applicant II. [...] s. Decision of the Court of First Instance in a repeated administrative procedure

[...] s. Decision, Zala County Government Office Requested II. [...] s. upholding its decision

Veszprém Administrative and Labor Court [...] Order, Record of Remedies

to the letter of request.

According to the Applicant, the Applicant I. by sending the request electronically and administrators by reading the decisions, Requested II. the request was made electronically unlawful data processing because of the data concerning the Applicant

transmitted. According to the Applicant, the Applicant II. provided by unofficial e-mail his personal data and complained that all the authorities in the country had been informed of the procedure.

The Applicant requested the Authority to investigate and establish the above violations.

At the request of the data subject on the right to information and freedom of information

CXII of 2011 on the basis of Section 60 (1) of the Information Act (hereinafter: the Information Act)

official proceedings have been initiated. The Authority shall, at the same time as notifying the initiation of the procedure, issue orders

in order to clarify the facts, requested information on the matter from the Requested I. and

Requested from II.

According to the reply letter of the Applicant I [...], the subject of the data protection authority proceedings from the e-mail address turnover - buda@bfkh.gov.hu on October 17, 2018.

The email you sent did not contain any personal information.

The text of the request, which was forwarded by the Applicant to all traffic control authorities

I., was as follows:

“Dear Head of Department!

I would like to inform you that administrative proceedings are pending before our Authority [...]

Annex IV to Regulation (EC) No 1071/2009

infringements of the Annex.

Please help - if you have it - to this day

(7.10.2018) in the case of roadside inspections in the last 2 years a

final / final decision to our Authority in scanned format (option

within 8 days) to the e-mail address turnover-buda@bfkh.gov.hu

please.

Thank you for your help. ”

According to the information provided by the Applicant I, only the

The applicant 's head of department I and the administrator appointed by him had access to it. Candidate I relied on

CCXXII of 2015 on the general rules of electronic administration and trust services.

(hereinafter: the E-Administration Act) § 17 (a) and § 2 (1),

according to which the Requested I is a body responsible for electronic administration and all tasks and

in the case of a matter within their competence, it shall ensure the possibility of electronic administration. THE

Requested I. interpretation of the law, the administrative bodies are not limited to the office gate

can be used to communicate with each other, so correspondence with GroupWise

in the correspondence system of the National Infocommunication Service Provider

It is part of the National Telecommunications Backbone Network provided by a joint stock company and in which everything

affected file “is a closed source native GroupWise encryption. Government Offices

correspondence between the two is provided by Nemzeti Infokommunikációs Szolgáltató Zrt. (NISZ Zrt.)

Takes place within the National Telecommunications Backbone Network (NTG) ”.

Applicant I also informed the Authority that in the

CL of 2016 on General Administrative Procedure. access to the documents provided to the Employer in accordance with the

provisions of Section 33 of the Act No.

On the 23rd day, requesting a copy of the case file

made available to the Employer's representative without anonymisation.

The Requested II. - [...] registration number - according to the statement of the Applicant I's request is justified

was the fulfillment of which the Acre. He could not deny it pursuant to Section 25 (2). The inquiry

Prior to the fulfillment of the II. the Ákr. § 25, § 27 and Infotv. The conditions of § 71 are met

examined. "In doing so, we found that for the controlled legal entity

on the designation of bodies responsible for the administration of transport

on 382/2016. (XII.2.) Government Decree (hereinafter: Government Decree) § 4 (4) 20.

The requesting authority shall have the powers and competences required by the requested authority

data in Ákr. Pursuant to Section 27 (1), it is entitled to get to know and handle them by their procedure

related to them and to get to know and manage them in order to carry out the procedure effectively

required."

In this connection, the Requested II. he also submitted that the request was as explained above

in addition, it was well-founded in its view because the information available to it (on road transport

21 / C of Act I of 1988 on §) does not contain some sub-data

which are necessary for the conduct of the official proceedings, such as the basis and the facts of the infringement.

The traffic control authorities may be informed of the infringements from the register

and those responsible for them, and therefore the According to the petitioner, it was claimed by the Applicant that

"With the transfer, all the authorities in the country have been informed of the procedure, it does not stand still." THE

Applicant II.- attached to the Authority in a copy - provided at the request of Applicant I.

reply was sent only to Part I of the Applicant, the other traffic control authorities a

Applicant II. he did not receive an answer.

The request is based on the Requested I. E-administration tv. He received it from an official e-mail address published in

accordance with Section 57 (1), in which he expressly requested that the request be complied with.

Applicant I and Applicant II. The e-mail address used by is part of the government backbone

forms.

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The Requested II. He further submitted that the Applicant had not requested it in the official proceedings before him

the Ákr. Pursuant to Section 28, he lawfully transmitted his data to the Applicant I.

the name and address of the applicant in the first and second instance decisions.

The Authority GroupWise made a request pursuant to Section 25 (1) (b) to the developer of the e-mail system, Nowell Magyarország Kft., in order to provide the Authority with information on whether the correspondence system complies with the provisions of the Administrative Procedure Act. requirements for electronic communication.

The Ákr. Response received from Nowell Magyarország Kft. Requested pursuant to Section 25 (1) (b) according to which "all operations performed in the system are subject to identification and authorization, i.e. events shall be logged. " "The system is the mail and the metadata associated with it stored in its database in such a way that they cannot be modified with administrator privileges, get to know the contents of the letters and the contents of the letters in the GroupWise internal database is stored encrypted so that it cannot be accessed bypassing the system. " "A GroupWise the integrity and confidentiality of data stored in its databases are not open source systems provided by the asymmetric encryption technology used by, but also the system manufacturer an encryption solution developed, maintained and supported by

II. Applicable law

On the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC

Article 2 (1) of Regulation (EU) No 2016/679 (hereinafter referred to as the General Data Protection Regulation) the Regulation should apply to personal data in a partially or fully automated manner and the non-automated processing of data which are part of a registration system or are part of a registration system they want to do.

Personal data pursuant to Article 5 (1) (b) of the General Data Protection Regulation collected only for specified, explicit and legitimate purposes and not treated with them in a way incompatible with the objectives; ("Purpose-bound").

Pursuant to Article 5 (1) (c) of the General Data Protection Regulation, personal data are: they must be appropriate and relevant to the purposes of the data processing and necessary

should be limited ('data saving').

Personal data pursuant to Article 5 (1) (f) of the General Data Protection Regulation

shall be handled in such a way that appropriate technical or organizational measures are taken

ensure the adequate security of personal data, the data is unauthorized

or unlawful handling, accidental loss, destruction, or damage

protection against privacy ('integrity and confidentiality').

Personal data pursuant to Article 6 (1) (e) of the General Data Protection Regulation

processing is lawful only if and to the extent that the processing is in the public interest

or a task performed in the exercise of a public authority conferred on the controller

necessary for its implementation.

Pursuant to Article 58 (2) of the General Data Protection Regulation, the supervisory authority is corrective

acting under the authority of:

(b) condemn the controller or the processor if he or she has breached his or her data processing activities

the provisions of this Regulation;

(g) order personal data in accordance with Articles 16, 17 and 18 respectively

rectification or erasure of data and restrictions on data processing, as well as Article 17 (2)

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shall notify the addressees with whom it is addressed in accordance with paragraph 1 and Article 19

or with whom personal data have been communicated;

(i) impose an administrative fine in accordance with Article 83, depending on the circumstances of the case

in addition to or instead of the measures referred to in this paragraph.

Infotv. Pursuant to Section 61 (2) (b), the Authority may order its decision - the

by publishing the identification data of the data controller or the data processor

in the context of the activities of a public body.

The Ákr. Pursuant to Section 27 (1), the authority is entitled to the client and other participants in the proceedings

specified in the law governing the natural identity of the customer

personal data and, unless otherwise provided by law, to clarify the facts

essential for accessing and processing other personal data.

The Ákr. Pursuant to Section 27 (2), the authority shall ensure that personal data

be protected. [The corresponding regulation was included in the administrative authority procedure

and the General Rules of Service of 2004 CXL. Act (hereinafter: Ket.) 1 Section 17 (1)

according to which during the official procedure or the service provided by the authority

In doing so, the authority shall ensure that the protection of personal data is ensured.]

The Ákr. Pursuant to Section 33 (1), the customer shall at any stage of the proceedings and its completion

you can still inspect the document created during the procedure.

The Ákr. Pursuant to Section 33 (3), a third party may then view the personal data or

to a document containing protected data, if it proves that the right of access to the data is exercised, or

necessary to fulfill an obligation arising from a law, judicial or administrative decision.

The Ákr. Pursuant to Section 34 (2), a document or

that part of the record from which a personal data may be inferred which

the conditions for access to it laid down by law do not apply, unless the data

lack of knowledge would prevent the right of access to the documents provided for in this Act

exercising their rights.

The e-administration tv. Pursuant to Section 51 (1), a cooperating body is Part Three of the Act

for the purposes of the E-administration tv. Body providing electronic administration pursuant to Section 1, Clause 17,

and a body performing a public function designated by the Government. Pursuant to Section 58 (1), the cooperating party

electronic communication between bodies shall be limited to that specified in this Act

in such a way that the cooperating bodies ensure that the consignment is included

the electronic identification of the person making the declaration, the integrity of the consignment,

proof of delivery of the consignment, the date of delivery can be established (a

hereinafter referred to as "secure electronic communication"). According to paragraph (2) (a) of the same section

secure electronic communication can be done with published secure electronic

by contact for contact details. The e-administration tv. Section 57 (2)

The availability for secure electronic communication in accordance with paragraph 1 (b) shall be as follows:

may be an electronic mail address for which the addressee undertakes to receive the information a confirmation.

The e-administration tv. Pursuant to Section 60 (1), the cooperating body, if it is aware that

that it is necessary for the settlement of a case pending before it or for the performance of its duties,

in the case of personal or classified data which is not available to it, it may be processed by law

- information is available from the primary source of information pursuant to paragraph 3, it shall be provided by law

in the absence of an exclusionary provision, electronically from a primary source of information.

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Application II. Ket still had to go through the official procedure for taking its decision in the present case apply.

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III. Decision

1. Data processing related to an official request

By the Applicant I to the Transport Supervision Departments of the Competent Government Offices - 2018.

October 17 - the request sent by e-mail did not contain any personal data,

it contained only the data of the legal person subject to its proceedings.

The Requested II. In addition to the data of the Employer, the decision made by the

also his personal data, as he was also a customer in this procedure.

The Requested II. forwarded to Applicant I by the decision requested in the request by the Applicant personal information.

The Requested II. Applicant I. together with the final decision requested in his application is other

also forwarded documents which also contained the Applicant's personal data.

The Requested II. forwarded to the Applicant I by the Applicant and his / her Employer

The part of the decisions made in the infringement case concerning the Applicant is the General Data Protection Regulation

According to Article 4 (1), the Applicant shall be deemed to have personal data, which data shall be the Applicant's

II. and stored in and filed in the file of the Applicant I.

inspection, a copy of which is provided for in Article 4 (2) of the General Data Protection Regulation

considered as data management. Accordingly, the general rules apply in the present case

provisions of the Data Protection Regulation, which are permitted by national law

should be read in conjunction with national legislation in line with the regulatory option.

In the same way as all domestic legal provisions relating to a given data processing,

in this case the Ákr. and the e-administration tv. related provisions of this Regulation

its rules need to be interpreted without breaking it down.

Fulfillment of an official request pursuant to Article 6 (1) (e) of the General Data Protection Regulation

shall be deemed to be mandatory data processing in accordance with point 1, during which the obligation - the general

as a rule pursuant to Article 6 (3) of the Data Protection Regulation - Ákr. § 25. THE

However, during the execution of the request, Ákr. § 27 and the general

the rules of the Data Protection Regulation must also be complied with. Consequently, the sought after as

the controller of personal data is not exempted from the mere fact that it fulfills the request

from the obligation to comply with the provisions of the General Data Protection Regulation during the transfer

adhere to the principles of purposefulness and data protection.

Applicant I's request concerns only the legal entity named and examined by him

sent a final / final decision, preceded only by that legal person

proceedings were pending in order to determine the legal consequences

relevant facts. In its reply to this request, the Requested Party II. the

The applicant did not anonymise his personal data in the file, despite the fact that a

the scope of the request does not extend beyond the request,

nor is the sending of a personal data version of the requested documents

was necessary.

In view of the above, the II. infringed Article 5 (1) of the General Data Protection Regulation

The principles of “purpose limitation” and “data economy” in paragraph 1 (b) and (c) should also have considered the transfer of personal data when fulfilling his / her request whether it is necessary to comply with the request, in particular because of the said official procedure and the request also concerned a legal person.

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According to the General Data Protection Regulation, it is appropriate and relevant to the purpose of the data processing processing of data is considered lawful, it must be ensured that it is only so personal data that are relevant to the specific purpose of the data processing are required.

Applicant II should have carried out this consideration, if any, and should have done so have taken the necessary measures (ie in the final / final decision sent to anonymisation of personal data) if the requesting

Ákr. Pursuant to Section 27 (1), personal information is essential for clarifying the facts entitled to access and process data in principle. It can be seen that Ákr himself. - otherwise in accordance with the General Data Protection Regulation, essentially the General Data Protection Regulation as a rule under Article 6 (3) of the Regulation, although it allows a very wide range of authorities of personal data, but on the one hand this provision itself is explicit refers to the criterion that the data are essential for the purpose in question, on the other hand, this provision nor does it override the above-mentioned fundamental provisions of the General Data Protection Regulation. From all this consequently, in proceedings brought by an authority against non - natural persons a request sent to another authority, with a content and purpose similar to the present case, by the applicant in the absence of such an express indication from the competent authority, shall not be construed as necessarily it also applies to personal data that do not have any relevant connection to the case.

Although the requesting authority is in a position to comply with the request, the the range of data, including personal data, required to establish the facts of your case so that his primary responsibility, among those legal ages, is to

decide whether the request is also necessary for personal data, but this is the case does not mean that any official request is necessarily and automatically so should be interpreted by the requested person as any sort of selection of personal data without covers. Moreover, it is precisely the provisions of the General Data Protection Regulation, as well as the requesting Åkr. To the restrictive provisions of Section 27 (1), and a the requested authority, the Act on the Protection of Personal Data. Section 27 (2) [or Ket. § 17 (1)], the request is not made in this respect can be interpreted broadly. It should be noted that the II. leading to a decision applicable to Ket. Section 17 (5) expressly provided for this requirement when it stated that, in the course of the procedure or the provision of a service, the authority: personal data, with the exception of proceedings under this Act in the same case, you may only forward it to another body if permitted by law or if the person concerned does so consent, which provision of the Act. - as the relevant data protection rules have followed anyway rules - to simplify regulation, it no longer explicitly repeats it.

The Requested II. therefore, when the Applicant's purpose is clear and personal to make a request for the transfer of data without reference to it for this purpose personal data in addition to the data necessary for the execution of the request infringed Article 5 (1) (b) and (b) of the General Data Protection Regulation (c).

Nor is the fact that the Authority became aware of it in the present case precluding a finding of such an infringement based on the data, it is unlikely that it caused a direct disadvantage to the Applicant in view of the fact that in the previous official case covered by the request, the He was also a client of an employer, i.e. the first instance decision in question had previously been in full he could get to know him. This is only because the requested Applicant II. - because he doesn't know the entire case before the Applicant I, all its clients, other participant, the exact subject - is not in a position to make the data sent later

determine or have any effect on the use of

the effects of the wider data transmission, the disadvantage or less disadvantage

he can't even assess.

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2. Data management of the requesting authority

The Acquired I. § 27 (1) and (2), as well as the general data protection decree

Article 5 (1) (b) and (c) - and Article 6 (1) of the General Data Protection Regulation

From the requirement of necessity in paragraph (a) (e), it can be deduced from

had an obligation to examine the documents received in response to the request

also in terms of the personal data contained therein for the successful conduct of the proceedings

whether they are essential and, if not, discontinue them, or

- if this is not possible without prejudice to the probative value of the evidence, at least to the extent that

that this - the procedure is not essential for the successful conduct of the facts

necessary - data is stored by the authority but is kept closed and used only in that case

if and to the extent necessary to prove the integrity of the record containing that data

required. This was not the case in the present case, as it was pending before Applicant I.

The client of the proceedings was the Employer, so only the part of any previous decision that applies to him

may have been relevant to the case. Strictly speaking, the Requested II. its decision is in fact the same

contained two decisions in its proceedings (a separate sanction for different customers

established) and thus it is even more obvious that only one decision, the Employer

relevant in the new regulatory case. Accordingly, if Applicant I complied

Article 5 (b) and (c) and Article 6 (1) (e) of the

would not have been possible at the time of access to the file

Nor to make the applicant's personal data available. The Ákr. The same from § 27 (1)

follows.

With regard to access to the file, the Authority is of the opinion that Ákr. The provisions of Section 33

requiring data processing pursuant to Article 6 (1) (e) of the General Data Protection Regulation

may be considered as a rule subject to the restrictions of Section 34 and the General Data Protection Ordinance

shall apply in accordance with the other provisions of

However, with regard to access to the file, Ákr. Section 34 (2) expressly confirms this

the obligation of the Application can be deduced from the general data protection regulation

II. To provide personal data of persons who have no role in the proceedings

they do not even know about it and whose personal data is not relevant at all

do not show a connection with the case, make it anonymous, anonymize it. In such a case

the procedural rights of the person requesting access to the file may not be infringed. From this

consequently, such data are different - they are considered to be third parties in relation to the data subject

there is no longer a proper legal basis for making it available to individuals

authority.

The institution of the confidential handling of the personal data of the participants in the proceedings has its disadvantages

and the reason for this regulation is precisely that even in these cases

it may be necessary to make personal information anonymous, but it must be seen that it is the kind

protection is different from the general protection rules of the General Data Protection Regulation, and the two

they are not interchangeable. It is for that reason that the a

reference to the fact that the Applicant, if applicable, not before

asked for the confidentiality of his personal data because - in addition to that procedure

as a customer of Ket. according to the then rules (§ 39 / A), it did not have a legal possibility to do so either,

and is irrelevant to access to the file. The Applicant is personal

It is necessary to decide independently on the processing of the data of the Applicant in procedure I, the data processing

the necessity, purposefulness and proportionality of the data subject

should be assessed in the light of its role in the procedure.

On the basis of the above, the Authority has determined that the Requested I. for the representative of the Employer

carried out unlawful data processing during the provided access to the file, because before the Requested I.

In the ongoing official proceedings, the Applicant could not have disclosed his personal data to the

Available to employer. The Ákr. Due to Section 34 (2), the Requested I. has access to the file

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contrary to the principle of purposeful data management and data saving

make the personal data of the Applicant available to a third party, ie the representative of the Employer

thereby also infringed Article 5 (1) (b) and (c) of the General Data Protection Regulation.

From this point of view, it is irrelevant that with this illegal data processing, the Employer

as a legal person, he could not have access to personal data which was no longer known to him,

since the II. prior to which a case containing the Applicant's personal data was pending

The decision was also previously served on the Employer as a joint and several debtor

Applicant II. procedure. However, given that the Employer as a data controller is also

is obliged to ensure that the data it learns and handles about its employees is subject to the relevant data protection

handle it in accordance with the rules, so above all to ensure that each piece of data

even within its work organization, it can only be known to the person who is entitled to the given data management purpose

necessarily involved in its implementation. It follows from the fact that a

Employer and his / her employees in the previous case (authorized representative)

have been able to obtain the personal data of the Applicant generated in the previous case, it does not follow

necessarily to all the employees who acted in the pre-I proceedings

they should necessarily have had access to this data. The Requested I. as above

therefore, it cannot be ruled out beyond a reasonable doubt that any

it must not have been to the detriment or risk of the privacy of the data subject.

3. Electronic data transmission

The e-administration tv. examination of all requirements for electronic means of communication

(electronic identification of the person making the declaration included in the consignment, consignment

ensuring the integrity of the consignment, proof of delivery, date of delivery

does not fall within the remit of the Authority. From a privacy point of view, only that

it may be examined whether the consignment may have become known to unauthorized persons or

Article 5 (1) (f) of the General Data Protection Regulation, ie 'integrity and

confidentiality "and the data security requirements of the data controllers.

The e-mail address provided by the Applicant I. to which the Applicant II. a reply was received and

Applicant II. e-mail address from which the reply was sent, E-administration tv. Pursuant to Section 57 (1)

availability for secure electronic communication, so the data transfer from the e-mail address jarmu@zalagov.hu to

illegal data processing took place because it was adequate from a data security point of view.

4. Legal Consequences

The Authority grants the request of the Applicant and Article 58 (2) of the General Data Protection Regulation.

Condemns Applicant I and Applicant II on the basis of paragraph b) of the General Order

infringement of Article 5 (1) (b) and (c) of the Data Protection Regulation.

The Authority shall inform Infotv. Pursuant to Section 61 (2) (b), the decision shall be ordered by the data controllers,

ie Applicant I and Applicant II. by publishing its identification data

bringing.

ARC. Other issues

The powers of the Authority shall be exercised in accordance with Infotv. Section 38 (2) and (2a) determine the jurisdiction of the country

covers the whole territory.

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The Ákr. § 112 and § 116 (1) and § 114 (1), respectively

there is an administrative remedy against him.

The rules of administrative litigation are laid down in Act I of 2017 on the Procedure of Administrative Litigation (a hereinafter: Kp.). A Kp. Pursuant to Section 12 (2) (a) by decision of the Authority

The administrative lawsuit against the court falls within the jurisdiction of the court Section 13 (11)

the Metropolitan Court has exclusive jurisdiction.

Act CXXX of 2016 on Civil Procedure. Act (hereinafter: Pp.) - the Kp. Section 26 (1)

applicable pursuant to § 72 of the General Court in a lawsuit falling within the jurisdiction of the General Court representation is mandatory. Kp. Pursuant to Section 39 (6), unless otherwise provided by law, a the filing of an application does not have suspensory effect on the entry into force of the administrative act.

A Kp. Section 29 (1) and with this regard Pp. Applicable in accordance with § 604, electronic

CCXXII of 2015 on the general rules of public administration and trust services. Act (a

hereinafter referred to as the Customer's legal representative pursuant to Section 9 (1) (b) of the E-Administration Act obliged to communicate electronically.

The time and place of the submission of the application is Section 39 (1). The trial

Information on the possibility of requesting the maintenance of the It is based on § 77 (1) - (2). THE

the amount of the fee for an administrative lawsuit in accordance with Act XCIII of 1990 on Fees. Act (hereinafter: Itv.) 44 / A. § (1). From the advance payment of the fee, the Itv. Section 59 (1)

and Section 62 (1) (h) shall release the party initiating the proceedings.

The decision of the administrative body finding an infringement is data in the public interest, and in this case for the publication of the decision in Annexes I and II. with your credentials

row. The Authority shall publish the decision on its own website in accordance with Infotv. § 61

Pursuant to paragraph 2 (b).

During the procedure, the authority exceeded the Infotv. One hundred and twenty days in accordance with Section 60 / A (1) administrative deadline, therefore Ákr. Pursuant to Section 51 b), it pays ten thousand forints to the Applicant.

Budapest, May 28, 2019

Dr. Attila Péterfalvi

President

c. professor