

Case number: NAIH / 2019/2526/2.

History: NAIH / 2018/6142 / H

Subject: Partial decision granting the application

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Before the National Authority for Data Protection and Freedom of Information (hereinafter referred to as the Authority) [...]

the right of the applicant (hereinafter referred to as the Applicant) to rectify and erase [...]

hereinafter referred to as the "Debtor")

the following decision in an official data protection procedure.

I. The part of the Authority relating to the finding of an infringement of the right to cancel

gives place.

I.1. The Authority finds that the Debtor has not complied with the Applicant's request for cancellation

and manages the data of the Applicant's telephone number without any legal basis,

and violated the purpose limitation and data protection principles by handling the data.

I.2. The Authority finds that the Debtor did not inform the Applicant personally in advance

processing of your data for purposes other than those for which they were collected.

I.3. The Authority shall at the same time prohibit the Debtor from using the [...] telephone number and order that

delete the data from all records. The fact of the erasure and the fact that the erasure is a

He also notified the applicant, certifying it to the Authority.

I.4. The Authority calls on the Debtor to provide proof of the action taken in court.

30 days after the expiry of the time limit for bringing an action

send it to the Authority within

II. That part of the application is for the Authority to establish the right to rectification

infringement, the Authority shall reject it.

III. The Debtor shall be liable by the Authority for any unlawful processing of data by him

1,000. 000 HUF, ie one million HUF

data protection fine

obliges to pay.

No procedural costs were incurred during the official proceedings and no provision was made for them the Authority.

The fine shall run from the expiry of the time limit for bringing an action for judicial review within 15 days of the Authority's centralized revenue collection for clearing forint account (10032000-01040425-000000000 Centralized collection account IBAN: HU83 1003 2000 0104 0425 0000 0000). When transferring the amount, NAIH / 2018/6142.

JUDGE. number should be referred to.

If the Debtor fails to meet its obligation to pay the fine on time, it shall be in arrears must pay a supplement. The rate of the late payment interest is the statutory interest, which is in arrears equal to the central bank base rate valid on the first day of the calendar half-year concerned. The fine and the in the event of non-payment of the late payment allowance, the Authority shall order the enforcement of the decision, the fine and the recovery of late payment in the manner of taxes. Fines and penalties for late payment shall be recovered by the National Tax and Customs Administration.

There is no administrative remedy against this decision, but from the date of notification within 30 days of the action brought before the Metropolitan Court in an administrative action can be challenged. The application must be submitted to the Authority electronically, which is the case forward it to the court together with his documents. The request for a hearing must be indicated in the application. For those who do not benefit from full personal exemption, the judicial review process its fee is HUF 30,000, the lawsuit is subject to the right to record material fees. In the proceedings before the Metropolitan Court legal representation is mandatory.

EXPLANATORY STATEMENT

I. Procedure and clarification of the facts

By a legal representative certified by the Applicant on September 28, 2018 submitted a request for rectification and erasure of his data

requested the Authority to conduct a data protection official procedure and to establish an unlawful data processing.

According to the application submitted to the Authority, the Applicant, together with [...], which on 31.08.2010 merged into the Debtor, entered into a loan agreement to finance the purchase of a car.

By letter dated 12 July 2018, the Applicant informed the Debtor that the

address and requested that the telephone number be deleted from the personal data of the data subject. THE

In his reply dated 16 August 2018, the debtor stated that in his registration system

will only record the new address data as an address if the Applicant sends him the

a copy of your address card and stated that you will not delete the phone number from the register,

"Having regard to the General Data Protection Regulation (GDPR) of the European Union

after consideration of interests, we are still entitled to manage a

for the purpose and for the purpose of enforcing an overdue debt by telephone. "

At the request of the data subject, the right to information and the

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

data protection authority proceedings have been initiated.

According to the Debtor's statement, the Applicant has given the telephone number to manage the data

has taken note of the withdrawal of his consent, but has not complied with his request

on the grounds that, in the light of the balance of interests which it considers, it is entitled to deal with it

personal information as well.

According to the Debtor's statement, the telephone number of the Applicant [...] dated 14.05.2009

A request for financing was made available to our Company on Form I. THE

the legal basis for registration was the consent of our client ".

According to the Debtor 's statement and the [...] documents attached by the Applicant to the Debtor in 2018.

was received by the Applicant on 27 July to correct the address data and delete the telephone number

to which he wrote the Obligatory Response on 16 August 2018. THE

Defendant refused to correct address information and delete phone number

application.

The Debtor in connection with the procedure for changing the address change it stated that this personal data is used exclusively by a document issued by an authority or its by presenting a copy. The Data Management related to the copy of the document is obligated on the prevention of money laundering and terrorist financing

LIII of 2017 on the prevention of (hereinafter: Pmt.)

referred to, which prescribes the scope of customer identification data and is required for identification documents.

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.

According to recital 47 of the General Data Protection Regulation, if the data processing legal basis is a legitimate interest, a prior balancing of interests must be carried out it is necessary to determine, inter alia, the legitimate interest, the effect on the data subject and whether whether the processing is necessary or proportionate and whether it is a legitimate interest or not whether the right of the data subject is superior.

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').

Processing of personal data under Article 6 (1) of the General Data Protection Regulation

lawful only if and to the extent that at least one of the following is met:

(a) the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes

...

(f) processing for the legitimate interests of the controller or of a third party

necessary, unless the interests of the data subject take precedence over those interests

or fundamental rights and freedoms which call for the protection of personal data,

especially if the child concerned.

Pursuant to Article 6 (4) of the General Data Protection Regulation, if different from the purpose for which the data were collected

processing for that purpose is not with the consent of the data subject or of an EU or Member State

is a right that is a necessary and proportionate measure in a democratic society

to achieve the objectives set out in Article 23 (1), to establish that it is different

whether the processing for personal purposes is compatible with the purpose for which the personal data were originally provided

collected, the controller shall take into account, inter alia:

(a) between the purposes for which the personal data are collected and the purposes for which they are intended to be further processed

possible contacts;

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(b) the conditions for the collection of personal data, in particular the data subjects and the

relationships between data controllers;

(c) the nature of the personal data, in particular that they are personal data within the meaning of Article 9

whether it is a matter of dealing with special categories of

and the processing of criminal data in accordance with Article 10;

(d) the possible consequences for data subjects of the intended data

further treatment;

(e) the existence of appropriate safeguards, which may include encryption or pseudonymisation.

Pursuant to Article 13 (3) of the General Data Protection Regulation, if the controller is personal

intends to carry out further data processing on data other than for the purpose for which they were collected;

prior to the processing, he shall inform the data subject of this different purpose and in paragraph 2

any relevant additional information referred to in

Under Article 16 of the General Data Protection Regulation, the data subject has the right to request

the data controller shall correct inaccurate personal data concerning him without undue delay.

Pursuant to Article 17 (1) (b) of the General Data Protection Regulation, the data subject is entitled to

that, at his request, the controller deletes his personal data without undue delay

data, and the controller is obliged to provide personal data concerning the data subject

delete without undue delay if the data subject withdraws the authorization referred to in Article 6 (1) (a);

consent to the processing, and there is no other consent to the processing

legal basis.

Pursuant to Article 58 (2) (b), (c) and (i) of the General Data Protection Regulation

acting within the corrective power of the competent authority:

(b) reprimands the controller or the processor if he or she is acting in a data-processing capacity

has infringed the provisions of this Regulation;

(c) instruct the controller or processor to comply with this Regulation

the exercise of his rights under this Regulation;

(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.

Pursuant to Article 17 (3) of the General Data Protection Regulation, paragraphs 1 and 2 do not

applicable if data processing is required:

...

e) to file, enforce or defend legal claims.

2017 on the prevention and deterrence of money laundering and terrorist financing.

year LIII. Pursuant to Section 6 (1) of the Act (hereinafter: Pmt.), the service provider shall provide customer due diligence shall apply

(a) when establishing the business relationship;

b) transaction orders in the amount of three million to six hundred thousand forints or more

fulfillment;

c) in the case of a merchant of goods, the amount of transactions equal to or exceeding HUF 2 million to five hundred thousand

when executing an order in cash;

d) in the amount exceeding three hundred thousand forints, as defined in Article 3 (9) of the Decree

when executing a transaction order that qualifies as a money transfer;

(e) in the case of a non-gambling betting operator, remote gambling

six hundred thousand in the case of non-communication, non-communicative devices and systems

payment of prizes amounting to or exceeding HUF, not qualifying as remote gambling,

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in the case of a reception organized by means of a communication device and system, the amount of HUF 6,000 thousand or when making a payment in excess of the player's balance;

(f) the occurrence of data, facts or circumstances indicating money laundering or terrorist financing

if a screening as set out in points (a) to (e) has not yet taken place;

(g) if the accuracy or adequacy of previously recorded customer identification data

there is doubt about this.

III. Authority decision

III.1. The Applicant 's request to exercise his right of cancellation

By letter dated 12 July 2018, the Applicant, through his legal representative, requested the Debtor to

delete the contact phone number from your personal information.

In its reply, the Debtor rejected the Applicant's request on the grounds that this

data after a balance of interests has been carried out in accordance with the General Data Protection Regulation

continues to be entitled to handle overdue debt by telephone inquiry

in order to enforce and for the purpose of

The Debtor also stated in his statement during the proceedings that he considered that he would continue to do so

are entitled to handle the telephone number because Article 17 (1) of the General Data Protection Regulation

(b) if the data subject withdraws the data subject

consent, the controller shall not be obliged to delete the data if it has another legal basis

data management. On the basis of their balance of interests, there is a legitimate interest as a legal basis.

In the case of data processing covered by the General Data Protection Regulation, data processing

is an essential condition for its legality to have an appropriate legal basis.

In the case of consent-based data processing, the general rule must be observed

Article 4 (11) of the Data Protection Regulation, according to which one of the conceptual elements of consent is

volunteering, a decision based on one's own decision. This right to information self-determination means

that, with the exception of statutory data processing, everyone has their own personal data

everyone decides whether or not to give their personal data to someone else,

thus not only on the consent but also without any obligation to state reasons

you can also decide to revoke it.

III.2. Consideration of the data management of the Mandatory Telephone Number in relation to data

The existence of a legitimate interest in the legitimate interest must be justified by a balancing of interests in the general data protection regulation

According to recital (47).

The balance of interests prepared by the Debtor does not comply with the general data protection for several reasons requirements of this Regulation.

The Authority highlights the following shortcomings, which are listed by way of example, in relation to the Debtor's balance of

interests:

1. A preliminary balancing of interests shall be carried out separately for different purposes. The Authority sent by the Debtor for data processing related to the telephone number data

consideration of interest does not meet this requirement because of data management

The following objectives have been identified:

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"Financial leasing, granting of loans and leases, performance and execution of a contract: from a contract fulfillment of the rights and obligations arising from the contract, informing the customer, related to the breach of contract providing information, settling a contract, enforcing collateral, enforcing a claim, negotiation, settlement, offering payment facilities. "

Based on the above, it can be concluded that the Debtor has indicated several data management purposes, however he did not weigh the interests on purpose.

For example, the Debtor in the development of customer service activities in the consideration of the attached interest, it also refers to the "criterion" on the basis of which the processing of telephone number data is legitimate interests outweigh the legitimate interests of the Applicant in deleting his personal data. This is one a separate purpose that is not tied to a legitimate interest in enforcing a particular claim, so it is

In this case, the Debtor must also perform a separate consideration of interests in this regard.

2. It puts economic interests and convenience first in the interests of the data subject and fundamental rights, without proving the primacy of those interests, and it does not substantially carry out proportionality.

For example, in the case of a telephone inquiry,

Applicant should respond immediately, i.e. make decisions without being relaxed circumstances would reconsider your answers, so this type of contact is clear it involves more intrusion into your privacy than a postal inquiry.

3. In the opinion of the Authority, the Debtor is incomplete and incorrectly identifies the data subject interest.

For example, as stated in the balance of interests, "Other forms of communication, channels of customer and they are also a more costly solution for the data controller, so it is in the interest of both parties that the a less costly, less burdensome application form should be used (personal request, legal proceedings). "

4. "A telephone conversation gives the data controller an opportunity to assess the more expensive one recovery proceedings (eg legal proceedings, court enforcement). "

The Debtor does not even indicate this as a data controller goal, although the assessment of the chances of recovery is one of the most important purpose and interest.

5. The Debtor has also indicated arguments that are of interest irrelevant. For example, the extent to which the Debtor as a data controller complies is irrelevant data security requirements.

6. In Section 4 of the Mandatory Telephone Number's Consideration of Interest in Data Processing the warranties listed are general. The Debtor does not specify the type of receivables management refers to the regulations and recommendations related to data management if necessary just in general "the receivables management related regulations and recommendations for communication and communication ".

In the absence of a proper balance of interests, the Debtor may not invoke a legitimate interest as a legal basis, therefore, the Debtor is required to process the Applicant's telephone number data under the General Data Protection Regulation

It cannot be based on Article 6 (1) (f), so the data processing in question has no legal basis and is therefore

the Debtor illegally records the telephone number data.

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In the Authority's view, there is a legal basis for the processing of telephone number data in the balancing of interests arguments put forward in favor of a legitimate interest of the insurer (ie those listed in point 5 of the balance of interests)

"Aspects") are not acceptable because they do not prove that the Debtor is

The applicant 's legal interest in data processing takes precedence over the Applicant' s right to:

excludes the possibility of contact by telephone during negotiations with the Debtor.

Referring to the above, the Authority has determined that the data processing of the Debtor is not in compliance nor the principle of purpose and necessity ("data saving"), therefore data management

Article 5 (1) (c) of the General Data Protection Regulation

it crashes.

Given that the processing of the data requested to be deleted is not required by law for the Debtor, furthermore

in the absence of a proper balance of interests, due to the above, the general data protection

Article 6 (1) (f) of the Regulation, the Debtor shall be required to provide that the Applicant

breach of Article 17 (1) of the General Data Protection Regulation,

did not ensure the exercise of the Applicant's right to cancel.

III.3. Data processing for purposes other than the original purpose

Article 6 (4) of the General Data Protection Regulation allows for the processing of personal data

be handled by the controller for purposes other than the original purpose of the data processing, provided that the

data processing is compatible with the original purpose of the data processing for which the personal data are intended originally collected. In this case, the controller must take into account several aspects,

of which the General Data Protection Regulation is listed in Article 6 (4) by way of example

highlights the circumstances that it considers most important to consider.

In the present case, it can be stated that the Debtor is obliged to

handles the Applicant's telephone number data for other purposes, such purpose e.g. customer service

activity development. For this purpose - in addition to the fact that the Debtor is not named

as a data processing purpose, merely in its balancing test as an aspect,
it should have applied Article 6 (4) of the General Data Protection Regulation, and
it should have established whether the original purpose of the data processing and the different purpose were compatible.
The Debtor did not carry out this consideration, therefore the legal basis is for this purpose of data processing
nor has it been substantiated.

If, on the basis of these considerations, the Debtor had come to the conclusion that
compatible with the new purpose of the data management, in which case the new data management purpose and for this
All relevant information related to the application is provided to the Applicant in accordance with Article 13 of the General Data
Protection Regulation.

should have provided information under Article Incompatible data management purposes
and in the case of new data processing is clearly not possible, as it is appropriate and valid
there is no legal basis.

The Authority found that the Debtor had violated the general data protection principle on the basis of the above
Articles 6 (4) and 13 (3) of this Regulation.

III.4. Purpose-based and data-saving principles

III.4.1. THE

Required

phone number

with data

related

data management

The following data processing purposes have been identified as
relevant

“Financial leasing, granting of loans and leases, performance and execution of a contract: from a contract
fulfillment of the rights and obligations arising from the contract, informing the customer, related to the breach of contract

providing information, settling a contract, enforcing collateral, enforcing a claim, negotiation, settlement, offering payment facilities. "

Personal data pursuant to Article 5 (1) (b) of the General Data Protection Regulation may be collected for a clear and legitimate purpose. This means starting data management the purpose of the data processing must be specified and assessed accordingly which personal data are required and this should be clearly stated. This requirement can only be met on a per-target basis, in the case of multiple targets linked to the targets data processing conditions should be assessed separately and clearly broken down by purpose to describe.

Based on the above, it can be stated that the Debtor has indicated several data management purposes, however did not carry out a balancing of interests by purpose, therefore the balancing of interests attached to it does not the need for further data management.

The Authority has established that the Debtor does not have a separate data processing purpose demonstrated the need for data processing, in breach of Article 5 of the General Data Protection Regulation Paragraph 1 (b) and (c).

III.4.2. The Debtor referred indirectly to the enforcement listed in the balance of interests aspects. The Authority is of the opinion that the telephone number is necessary for enforcement is not acceptable at all because debt management is not a legal process but a pre-implementation "procedure", which requires mutual cooperation and consensus between the parties to promote. Manage the Applicant's telephone number to recover the claim and contact the Applicant it is not essential to keep in touch with the Applicant It also handles other contact information to keep in touch.

In the Authority's view, written communication is the original purpose of data processing form is sufficient and appropriate. The person concerned must be able to choose between the written contact if you do not want to receive regular phone calls. In balancing interests there is no data controller interest that would take precedence over it, and it would be difficult

it is conceivable that such an interest existed.

The principle of "data protection" under Article 5 (1) (c) of the General Data Protection Regulation

the Debtor shall also take into account the processing of telephone number data. The Authority

In the opinion of the Debtor, the Debtor should have deleted the data of the Applicant 's telephone number, because the

The management of the applicant's address data even after the deletion of his telephone number ensures a

the possibility of contact and thus the Debtor wrote in the principle of "data saving"

would also fulfill its obligation.

Referring to the above, the Authority has determined that the data processing of the Debtor is not in compliance

nor the principle of purpose and necessity ("data saving"), so it is general

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

III.5. The Applicant's request for the exercise of his right to rectification

By letter dated 12 July 2018, the Applicant informed the Debtor that the

home address. In its reply dated 16 August 2018, the Debtor stated that it was a registrar

will only record the new home address data as an address in its system if it is sent by the Applicant

a copy of your address card.

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The Debtor in connection with the procedure for changing the address change it

has declared to the Authority that this personal data is a document issued exclusively by the Authority

or when a copy is presented.

The above statement made during the proceedings is contradicted by the fact that the Debtor's statement

According to the attached form entitled "Address of correspondence, change of address" "Permanent

notification of a change of address only at the same time as sending a copy of the address card,

may be made in writing by mail or from our Company's web interface ". So the document

in fact, it is not possible or sufficient to present a change in the data.

With respect to the processing of data related to the copy of the document, the Debtor shall be responsible for money

laundering and

Act LIII of 2017 on the Prevention and Suppression of the Financing of Terrorism Act (a

hereinafter referred to as the Pmt.), which prescribes the scope of data identifying the customer and

the documents required for identification. Address data is also included in this data.

The obligation to copy documents specified in Section 7 (8) of the Pmt is the service providers

related to the customer due diligence obligation. The Pmt. Section 6 lists it

the cases where the Pmt has a customer due diligence obligation. covered by

service providers. However, this list does not mention the case which, on request,

is one of the subjects of an official case, ie the case of notification of a change of address.

According to the Debtor's statement, "only the address information about the official card certifying the address

the Company needs a copy "," does not request a copy of both sides of the card ",

and, according to the Debtor's statement, "The digitization of a paper copy is received

shall be destroyed immediately thereafter. Copies of the digitized personal document 15

deleted from our register after one day. "

The Debtor's Declaration regarding the procedure for changing the address data

According to point 6, "he shall enter it in his register as a mailing address and shall subsequently use it

to contact his client '. According to the Debtor's statement on the same point, "A

Based on the announcement of the Legal Representative, the address [...] Was recorded as a mailing address a

into our register. "

In the Authority 's view, there is no objection to the fact that in order to change the address data a

He is obliged to ask for proof of the change in the data because of the general data protection regulation

is not expressly prohibited by the principle of accuracy and the Pmt. It can also be considered a reasonable measure due to §
12.

III.6. Legal consequences

The Authority granted the Applicant's request in part and Article 58 of the General Data Protection Regulation

(2) b) condemns the Debtor for his data processing activities

infringed Article 5 (1) (b) and (c) of the General Data Protection Regulation, Article 13 (3)

Article 17 (1), Article 6 (4) and the General Data Protection Regulation

In accordance with Article 58 (2) (c), instruct the Debtor to provide the [...] telephone number

delete from all records. The fact of the erasure and the fact that the erasure is a

He also notified the applicant, certifying it to the Authority.

The amount of the fine was determined by the Authority acting in accordance with its statutory discretion.

As to whether the imposition of a data protection fine is justified, the Authority

Article 83 (2) of the Data Protection Regulation and Infotv.75 / A. § considered ex officio

all the circumstances of the case and found that, in the case of the infringement found in the present proceedings,

a warning is neither a disproportionate nor a dissuasive sanction and therefore a fine

required.

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In imposing the fine, the Authority took into account the following factors:

- Unauthorized data processing significantly affects the Debtor's privacy and is caused by it

the violation of the law was caused by the intentional conduct and data management practice of the Debtor.

- The infringement is serious because it affects the exercise of the data subject's right (cancellation) and the

breached several articles of the General Data Protection Regulation, including in principle

also committed an infringement.

- By imposing a fine, the Authority's specific preventive purpose is to encourage the Debtor to

to review your telephone number data management practices.

- The Authority will determine the amount of the fine in addition to the specific purpose of the retaliation

also took into account the general preventive purpose to be achieved by the fine, with which - the Debtor

the data management practices of all market participants

to move towards legitimacy. There was a legitimate interest as a legal basis

not an optional rule applicable to any case or situation in the interest of the data controller,

but also a precise substantiation of the reference to a legitimate interest.

- Not to convict the Debtor for violating the General Data Protection Regulation

and the Debtor has cooperated in the detection of the infringement,

assessed by the Authority as an attenuating circumstance.

- Depending on the nature of the infringement - infringement of the rights of the persons concerned - the maximum amount of the fine that may be imposed is

EUR 20 000 000 pursuant to Article 83 (5) (b) of the General Data Protection Regulation, and

up to 4% of total world market turnover in the preceding business year.

- The Debtor's net income in 2017 was [HUF 4,000,000 thousand], of which [HUF 2,700,000 thousand] is business-like activity. The privacy fine imposed is a token amount and does not exceed

maximum fine that may be imposed.

ARC. Rules of procedure

The powers of the Authority shall be exercised in accordance with Infotv. Section 38 (2) and (2a), its jurisdiction is covers the whole country.

The Ákr. Pursuant to § 112 and § 116 (1) and § 114 (1)

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. 2016 on Civil Procedure

CXXX. Act (hereinafter: Pp.) - the Kp. Applicable pursuant to Section 26 (1) - Section 72 provides for legal representation in litigation falling within the jurisdiction of the Tribunal. Kp. Section 39 (6)

according to - unless otherwise provided by law - the filing of the application by the administrative

has no suspensory effect on the entry into force of the act.

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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: the e-administration Act), the client's legal representative pursuant to Section 9 (1) (b)

obliged to communicate electronically.

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

Information on the possibility of requesting a hearing is provided in the CM. Section 77 (1) - (2)

based on. The amount of the fee for an administrative lawsuit shall be determined in accordance with Act XCIII of 1990 on

Fees. law

(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 instituting the proceedings.

The Ákr. Pursuant to Section 135 (1) (a), the debtor complies with the statutory interest

shall be required to pay a late payment penalty if he fails to pay within the time limit

enough.

Act V of 2013 on the Civil Code 6:48. § (1)

in the case of the debtor, the calendar affected by the delay from the date of the delay

is obliged to pay default interest equal to the central bank base rate valid on the first day of the first half of the year to pay.

If the obligor does not duly prove the fulfillment of the prescribed obligations, the Authority shall:

considers that it has not fulfilled its obligations within the time allowed. The Ákr. According to § 132, if a

The debtor has not complied with the obligation contained in the final decision of the Authority, it is enforceable.

The decision of the Authority Pursuant to Section 82 (1), it becomes final with the communication. The Ákr. 133.

§, unless otherwise provided by law or government decree - a

ordered by the decision-making authority. The Ákr. Pursuant to § 134, enforcement - if law,

a government decree or, in the case of a municipal authority, a local government decree, otherwise

by the state tax authority. Infotv. Pursuant to Section 60 (7), the Authority

to perform a specific act, to behave in a specific manner,

the Authority shall enforce the decision in respect of the obligation to tolerate or discontinue

implements.

Budapest, March 4, 2019

Dr. Attila Péterfalvi

President

c. professor

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