

Case number: NAIH / 2020/1507.

Clerk:

Subject: Rejection of 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) [...] and [...] (residence: [...]) at the request of the applicants (hereinafter referred to as the Applicants) by [...] (registered office: [...]) hereinafter referred to as "Requested") in the following data protection authority proceedings brings:

I.1. In the decision of the Authority, the request for the deletion of the personal data of the Applicants rejects.

I.2. The Authority will establish of its own motion that the Applicant protection of individuals with regard to the processing of personal data and on the free movement of such data, and Regulation (EU) 2016/679 repealing Directive 95/46 / EC (a hereinafter referred to as the GDPR) the personal data of the Applicants concerned by the application.

I.3. The Authority will ex officio oblige the Applicant to initiate a judicial review the expiry of the relevant time limit for bringing an action or, in the case of a review, the court within 15 days of its decision to the Applicant, if the Applicant has a legitimate interest for the processing of personal data for claims management purposes and this interest of the Applicant is essential priority under Article 14 (2) (b) of the GDPR inform the Applicant of the legitimate interest required for his / her personal data for the purpose of debt management, this interest takes precedence over the fundamental rights of the Applicant and inform the Applicant of his right to protest and how to practice! If you cannot prove a legitimate interest, delete this data!

I.4. The Authority shall ex officio oblige the Applicant to comply with Annex I.3. included in point in the meantime, restrict the personal data of the Applicants for claims management purposes

treatment.

II. In view of the fact that the administrative time limit has been exceeded, the Authority shall
that HUF 10,000, ie ten thousand forints, to the Applicant's choice - to be indicated in writing
- pay by bank account or post.

I.3.-I.4. fulfillment of the obligation pursuant to point 1 to the Applicant from the taking of the measure
within 8 days of receipt of the supporting evidence.
to the Authority. In the event of non-compliance, the Authority shall order the decision
implementation.

There is no administrative remedy against the decision under point I, but a
within 30 days of the communication with the action brought before the Metropolitan Court
can be challenged in a lawsuit. The application shall be submitted to the Authority, electronically, which shall be
forward it to the court together with the case file. Indicate the request for a hearing in the application
must. For non-personal tax exemptions, judicial review
the fee for the proceedings is HUF 30,000, the lawsuit is subject to the right to record fees. Before the Metropolitan Court
legal representation is mandatory in these proceedings.

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The Authority draws the attention of the Applicants to the fact that it is open to challenge the decision
until the expiry of the time limit for bringing an action or, in the case of an administrative lawsuit, until a final decision of the
court a
data affected by disputed data management cannot be deleted or destroyed!

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

I.1. The Applicants submitted an application to the Pest County Prosecutor's Office on 15 January 2019,

taking measures to delete their personal data from the Applicant

they asked. The request was received from the Pest County Prosecutor's Office on 30 January 2019

To authority.

According to the Applicants, "re-claiming a long-standing legally settled debt"

unreasonable, they were therefore requested by the Authority to order the data recorded by the Applicant deletion.

At the request of the Applicants, Infotv. Pursuant to Section 60 (1), NAIH / 2019/1591. case number data protection authority proceedings have been initiated.

I.2. In its orders, the Authority requested information on the matter from the Applicant in order to clarify.

In its reply dated 19 March 2019, the Applicant stated that against the Applicants registered under case number [...] arising from a loan transaction marked with an existing account number [...] purchased the receivable at a discount from [...] on 08 July 2013 and from that date starts processing the personal data of the Applicants and the purpose of its data management with the Applicants enforcement of a claim against.

In its reply, the Applicant stated that, pursuant to Article 6 (1) (b) of the GDPR, on a contractual basis and Article 6 (1) (f) of the GDPR, ie

Applicants' personal identification data (name, birth name, mother's name, place of birth, date of birth), their address, details of their debt or its fulfillment (amount of debt, claim (principal, interest, cost, fee)), the title of the debt, transaction ID and file number.

The Borsod-Abaúj-Zemplén County

He replied to the request of the General Prosecutor's Office dated 11 February 2019, according to which a

He requested the documents received in the framework of the assignment during the ongoing investigation procedure Applicants to the Pest County Prosecutor's Office,

in their submission to the Borsod-Abaúj-Zemplén County Prosecutor's Office

complained that the Applicant was harassing them for a debt that was long overdue and legally arranged.

In his reply, the Applicant stated that the Applicants for their application were of [...]

a letter is attached to another credit agreement with case number [...] and not by the Debtor.

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the limitation period for a claim acquired by assignment. The case number [...]

he has no knowledge of the loan agreement.

It is also apparent from the above reply that [...] terminated the loan agreement concluded with the Applicants on 30 April 1996 in view of the non-performance and then its material claims under the contract.

on 11 January 2001 following his termination, he was transferred to [...].

According to the Applicant, the claim against the Applicants is Civil

Act IV of 1959 on the Code Section 327 (1) and (2) of the Civil Code (hereinafter: the Civil Code)

not expired on the basis of. The Claimant indicated that according to [...] 's debt management records, the

Applicants made a promise to settle the debt on 19 July 2012, acknowledging the

the existence of a debt. According to the claimant 's debt management records a

Requested from March 24, 2014 every year on the subject of a demand for payment sent

letter to the Applicants.

Attached to the reply letter dated 19 March 2019, the Applicant sent a claim management and

a copy of your complaint handling record from the loan transaction marked with account number [...]

in connection with the claim with case number [...], according to which the

sent the Applicants a first summons to settle the debt on 24 March

letter.

Attached to Article 30 (1) of the GDPR, the Applicant attached to its reply of 19 March 2019

a copy of the register pursuant to paragraph 1, as evidenced by the Applicant

"In order to fulfill its legal obligation" means Act C of 2000 on Accounting (a

hereinafter referred to as the Act) for eight years

personal information.

The Authority NAIH / 2019/1591/5. s. in his order he called on the Applicant to send it to it a copy of the contract on which the data is based, referring to the contractual legal basis bases.

In its reply of 23 April 2019, the Applicant stated that the contract to which

In its opinion, the processing of the Applicant 's personal data is necessary for the fulfillment of the concessionaire, i.e. [...]. and the Loan Agreement between the Applicants. Requested attached to its application a copy of the loan agreement with the original loan number [...], which the processing of data under Article 6 (1) (b) of the GDPR. THE a claim arising from the non-payment of an installment obligation arising from a loan agreement was the subject of a contract of assignment between [...] and the Applicant, and thus the Applicant considers that in the exercise of this right to process personal data and claims against the Applicants.

According to the Applicant's statement, the Applicants will only receive a written demand for payment they were not contacted at any time, either in person or by telephone.

In its reply dated 19 March 2019 and 23 April 2019, the Applicant indicated that the Applicants had not orally or in writing in the time since the assignment have complained about the processing of their personal data.

The Applicant is the Authority NAIH / 1591/8. in its reply to order No stated that prior to May 25, 2018, "not directly for Applicants provided prior information ", the information obligation is the by posting at the Applicant's registered office and on the Internet by publishing it on its website as part of its rules of procedure the number of receivables received by the Applicant in the framework of assignment is accurate

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address and contact details for the Applicant before the start of data processing by the Applicant

it was not known.

II. Applicable legal provisions

In the course of the Authority's proceedings, the CXXX of 2010 on legislation. Act (hereinafter: Jat.) 15.

§ (1) a) and (2) a) subject to the lawfulness of data processing

legislation in force during the period of implementation of the data processing operations

and - since the underlying substantive obligation does not

separable - decided on the legal consequences established by applying the same rules.

However, as regards the rules of procedure of the Authority, Jat. Section 15 (1)

Subject to paragraph 1 (b), the provisions in force at the time the proceedings are initiated shall be:

apply.

The relevant provisions of the GDPR in the present case are the following:

GDPR Recital 44: Data processing is lawful if it is

required under a contract or intention to enter into a contract.

Section 14 (2) of the GDPR: In addition to the information referred to in subsection (1), the data controller shall:

fair and transparent data processing for the data subject

the following additional information is required to ensure

(b) where the processing is based on Article 6 (1) (f), the controller or a third party

legitimate interests.

GDPR Article 6 (1) (b) and (f): Processing of personal data only if and to the extent that

lawful if at least one of the following is met:

[...]

(b) processing is necessary for the performance of a contract to which one of the parties is a party; or

to take steps at the request of the data subject before concluding the contract

required;

(c) processing is necessary for compliance with a legal obligation to which the controller is subject;

[...]

(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.

Article 17 (1) GDPR: The data subject has the right to request that the controller is unjustified

delete personal data concerning him without delay and the controller shall:

delete the personal data of the data subject without undue delay if the following

for one of the following reasons:

(a) personal data are no longer required for the purpose for which they were collected or for other purposes

treated;

(b) the data subject withdraws the authorization provided for in Article 6 (1) (a) or Article 9 (2) (a);

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

legal basis;

(d) personal data have been processed unlawfully.

GDPR Article 17 (3) (b): Paragraphs 1 and 2 shall not apply if

data management required:

(b) the Union or Member State law applicable to the controller governing the processing of personal data

or in the public interest or in the exercise of official authority vested in the controller

to perform a task performed in the exercise of a license;

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e) to file, enforce or defend legal claims.

Article 58 (2) (b) and (d) GDPR: Acting in the corrective capacity of the supervisory authority:

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

the provisions of this Regulation;

(d) instruct the controller or processor to carry out its data processing operations, where applicable

in a specified manner and within a specified period, in accordance with the provisions of this Regulation

Infotv. Pursuant to Section 2 (2), the general data protection decree is indicated therein

shall apply with the additions provided for in

Infotv. Pursuant to Section 38 (2), the Authority is responsible for the protection of personal data, and

the exercise of the right of access to data in the public interest and in the public interest

free movement of personal data within the European Union

promoting. According to paragraph (2a) of the same § in the GDPR for the supervisory authority

established entities and entities under the jurisdiction of Hungary

as defined in the GDPR and this Act.

Infotv. Pursuant to Section 60 (1), the enforcement of the right to the protection of personal data

the Authority shall, at the request of the data subject, initiate a data protection authority procedure.

Infotv. Pursuant to Section 60 (2), an application for the initiation of official data protection proceedings a

It may be submitted in the case specified in Article 77 (1) GDPR.

Infotv. Pursuant to Section 61 (1) (a), it was taken in a data protection official proceeding

In its decision, the Authority With the data management operations specified in Section 2 (2)

in this context, the legal consequences set out in the General Data Protection Regulation

you can apply. According to Article 58 (2) (b) of the General Data Protection Regulation, the supervisory

authority shall condemn the controller or the processor if it acts as a data controller

has infringed the provisions of this Regulation or, in accordance with point (d) of the same paragraph,

the supervisory authority, acting in its corrective capacity, shall instruct the controller to

where appropriate, within a specified manner and within a specified period of time

with the provisions of this Regulation.

Infotv. It is valid before May 25, 2018, when the data processing of the Applicant starts

Section 20 (2): The data subject in a clear and detailed manner before starting the data processing

be informed of all facts relating to the processing of your data, in particular data processing

the purpose and legal basis of the data subject, the person authorized to process and process the data, the

the duration of data processing, if the personal data of the data subject are processed by the data controller in accordance with

Section 6 (5)

and who can access the data. The information must cover

the data subject's rights and remedies.

Sztv. Section 166 (1): An accounting document is any such document issued, prepared, prepared by the enterprise.

or a natural person or other person with a business or other relationship with the enterprise

a document issued by the farmer (invoice, contract, agreement, statement,

credit institution statement, bank statement, legal provision, other documents that can be classified as such), regardless of the

method of printing or other production, which

supports its accounting.

Sztv. Section 169 (2): Directly and indirectly supports the accounting

accounting document (including general ledger accounts, analytical and detailed

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records) must be in a legible form for at least 8 years, with reference to the accounting records

retained in a traceable manner.

Unless otherwise provided by the GDPR, the data protection authority proceedings initiated upon request shall be

CL of 2016 on general administrative order. Act (hereinafter: Act)

shall apply with the exceptions specified in the Infotv.

The Ákr. Pursuant to § 36, the application is a written or personal statement from the customer

requesting an official procedure or a decision of the authority in the interests of his right or legitimate interest

in order to enforce it.

The Ákr. Pursuant to Section 62 (4), the authority is free to choose the method of proof, and a

assess the available evidence in its sole discretion.

Infotv. 75 / A. §, the Authority shall comply with Article 83 (2) to (6) of the General Data Protection Regulation

shall exercise its powers in accordance with the principle of proportionality, in particular by:

legislation on the processing of personal data or binding European Union law

for the first time in the event of a breach of the rules laid down in

in accordance with Article 58 of the General Data Protection Regulation, in particular

by alerting the controller or processor.

III. Decision

In the present proceedings, the Authority will establish the existence of the claim in relation to the data processing of the

Requested and

did not examine the legality of the Infotv. Not in accordance with paragraphs 38 (2) to (2a)

falls within the competence of the Authority. It is for the courts to decide this question. With respect

that the Applicant keeps a record of the claim against the Applicants in respect of which

the Applicants have not attached a court decision finding that this is not the case,

therefore, the claim held by the Claimant was considered to have a legitimate interest in principle.

In order to assess the Applicants' request for deletion of data, it was first of all necessary to:

Authority to examine whether the conditions for cancellation set out in Article 17 of the GDPR are met, ie

above all, that the processing of the data is for an appropriate purpose and that it is appropriate under the GDPR

whether, in the absence of an appropriate legal basis for the processing,

whether one of the exceptions under Article 17 (3) of the GDPR exists.

It can be stated from the statements of the Applicant and the documents attached to them that the Applicant has one

handles the personal data of the Applicants for several data management purposes in a timely manner.

III.1. Legal bases for the processing of the requested data

III.1.1. Data processed for the purpose of recovery

According to the Applicant's statement, the legal basis for its data processing is the contract between [...] and the Applicants

as they gave rise to claims arising from [...] by assignment

acquired.

The Authority finds that the legal basis under Article 6 (1) (b) of the GDPR - a

with the exception of certain pre-contractual steps, is applicable only if it is a contract

therefore not possible to extend this legal basis to

which, in order to remedy the situation resulting from the non - performance of the contract by the person concerned,

necessary for the Contracting Parties to take steps arising from their normal obligation to cooperate. THE
the performance of the contract may also include the steps taken by the data controller who signed the contract
concluded with the data subject, ie who is the other party to the contract, in the event of a delay in performance

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calls on the data subject to comply. However, according to Article 6 (1) (b) of the GDPR

a contractual legal basis is no longer applicable in the event that the controller fails to perform

assigns its claim against the data subject to a debt collection undertaking

(i.e. you want to solve the problem already outside the contract). Thus, the Applicant and

There is no longer a contractual relationship between the applicants. In addition, the claim is based on

the original loan agreement giving rise to the obligation had already been terminated in 1996.

The legal basis for the transfer of data in the context of an assignment is thus only different, typically the assignee
may have a legitimate interest in enforcing the claim on its own behalf.

According to the justification attached to the Civil Code, the transfer of claims is the same as the transfer of ownership
it is based on logic, so the assignment is in fact nothing more than a claim
transfer of ownership.

By assignment, the claim is separated from the original legal relationship from which it arises and
the concessionaire enters only in respect of the claim and not in respect of the fundamental relationship
in place of the transferor. By the assignment, the claim is separated from the basic legal relationship
and the assignee becomes the holder of the claim, enforcement of the claim by the assignee,
or the related data processing, no longer for the performance of that contract
from which the claim originally arose, since in this case the assignee
it should be enforced not by itself but by the assignor through assignment
acquired claim. By assignment, if it is for consideration, the
receivable from the assignor in whole or in part, depending on the purchase price
return. The assignee shall act in his own interest and for his own benefit in order to recover the claim,
since by assignment he becomes the holder of the claim and the enforcement of the claim, the debtor

enforcement and the processing of data for that purpose is in his legitimate interest and not it serves the performance of the underlying contract, as the claim is independent of the assignment changed from the contract.

As the Applicant has acquired the claim against the Applicants by assignment, as well as the personal data of the Applicants and thus became the owner of the claim, the legal basis for the processing of the data cannot be contractual under Article 6 (1) (b) GDPR legal basis.

However, this does not necessarily mean that the processing of Applicants' personal data is of any kind it has no legal basis as it was acquired in the course of its statutory receivables purchase activity to the personal data of the Applicants - natural personally identifiable data, and data on the claim - and the enforcement of legally acquired claims, and there was a legitimate interest in the processing of the above data from the legislation in principle.

III.1.2. Data processed for the purpose of fulfilling a legal obligation

The St. Pursuant to Section 169 (2), the accounting records are directly and indirectly the supporting accounting document must be in a legible form for at least 8 years, the accounting records retrievable in a retrievable manner.

The accounting document is the Act. Pursuant to Section 166 (1), for example, the contract, a an agreement that supports the accounting for the economic event.

The Authority has determined, on the basis of a copy of the assignment contract, that it is a Debtor

In its reply, the GDPR did not invoke Article 6 of the GDPR as a legal basis for the processing of the Applicants' personal data. Article 1 (1) (c) of the Act. With regard to Section 169 (2), the Debtor a

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It is mandatory to keep accounting documents containing the personal data of the applicants performs data management.

III.1.3. Data processed to protect legal claims

Borsod-Abaúj-Zemplén County Attorney General's Office attached to the application by the Applicant

It appears from the request that the processing of the Applicants' personal data by the Applicant a

It is necessary to protect the legal claim of the applicant. Submission of the application for adjudication

a legitimate interest of the Applicant before a court or authority having jurisdiction or jurisdiction

it counts as.

III.2. Applicants' request for deletion of data

The Applicants have requested the Authority to order the unduly treated person

erasure of their data.

III.2.1. Under Article 17 (3) (b) of the GDPR, the controller is not obliged to delete

shall apply in the event that the processing requires the processing of personal data, the

in order to comply with an obligation under Union or Member State law applicable to the controller

required.

The assignment contract between [...] and the Applicant and the Applicants assignment

documents containing personal data received in the framework of the

which the Applicant is entitled to under the Act. it must be kept for eight years. Accounting

The legal basis for the processing of personal data contained in documents is Article 6 (1) (c) of the GDPR.

therefore they cannot be deleted from Article 17 (3) (b) of the GDPR at the request of the Applicant

appropriately.

On the basis of the attached documents, the Authority concluded that Article 6 (1) (c) of the GDPR

The scope of data subject to mandatory data management is the same for the purpose of receivables management

range of data processed.

III.2.2. The processing may be considered lawful notwithstanding the data subject's request for erasure if it:

necessary to protect the legitimate interests of the controller. Submission of the application for adjudication

before a court or authority having jurisdiction or jurisdiction, has a legitimate interest

which justifies a legitimate restriction on the right of cancellation.

In view of the ongoing investigation procedure, Article 17 (3) (e) GDPR

further storage and processing of personal data despite the data subject's request for deletion considered lawful.

III.2.3. In view of the above, Article 17 (3) (b) and (e) of the GDPR and Article 6 of the GDPR

rejects the part of the Applicants' application in accordance with Article 1 (1) (f);

to order the Applicant to delete their personal data.

III.3. Obligation of the Applicant to provide prior information

The data subject is able to recognize, on the basis of prior and appropriate information, that the data processing is in question the impact on the right to information self-determination and privacy. Stakeholders a

information on the processing of their personal data through information

their right to information self-determination may prevail. In the absence of adequate information, the controller

An information dominance may develop on the side of which the rights and interests of the data subject may be used may be damaged.

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The data subject also has a fundamental right to the processing of his or her personal data during the handling of claims to track. An important requirement is that the debtors at the time of first contact receive appropriate information.

Based on the above, therefore, the data of the data subject for the purpose of the claim management organization's own claim may be considered lawful only if the person concerned has given prior notice received.

The availability of proper information is a vital element. About the conditions of data management

information should be provided directly to individuals, so it is important that debtors come first receive appropriate written information on the processing of data concerning them

certain circumstances. In any event, it is not sufficient that the information is merely available somewhere (a posted on the debtor's website or at its registered office).

Because the history of data management was completed earlier than May 25, 2018

data processing, therefore the Applicant, upon the first contact with the present case,

therefore, in the letter of formal notice sent on 24 March 2014, the notice should have been issued to Infotv was in force at the time of § 20 (2) to inform the Applicants of the data processing their legal basis and their rights regarding data processing.

III. 4. Legal Consequences

Pursuant to Article 58 (2) (b) of the GDPR, the Authority will automatically condemn the Applicant for violating Article 6 (1) (b) of the GDPR.

In accordance with Article 58 (2) (g) of the GDPR, the Authority shall ex officio order the restrictions on the processing of your personal data until the Applicant certifies the claims management the rights and interests of the Applicant as he did not prove this to the Authority during the proceedings.

The need for data management for the Claimant's claim management purposes is basically the claim its existence could be substantiated, however, this is disputed by the Applicant. The Applicant must therefore examine whether the disputed claim exists or is not time-barred, given that its data processing the legality of the decision depends on that question. If the claim exists, the Authority shall in order to control the data of the Applicant due to the illegality of its data control can be properly exercised by the Applicant - obliged the Applicant ex officio that a Pursuant to Section 14 (2) (b) of the GDPR, inform the Applicant how legitimate it is the processing of personal data necessary for the purpose of claim management due to the interest of the Applicant, this interest is the Applicant take precedence over his fundamental rights and inform the Applicant of his rights the right to protest and how to exercise it.

If the claim does not exist, delete the data for which there is no legal retention obligation.

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.

The decision is based on Ákr. 80.-81. § and Infotv. It is based on Section 61 (1). The decision is based on Ákr. § 82

Shall become final upon its communication pursuant to paragraph 1. The Ákr. § 112 and § 116 (1),

or pursuant to Section 114 (1), there is an administrative action against the decision

redress.

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The rules of the administrative lawsuit are set out in Act I of 2017 on the Rules of Administrative Procedure (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 a

case falling within the jurisdiction of the Tribunal. Kp. Section 39 (6)

unless otherwise provided by law, the date of filing of the application

has no suspensory effect on the entry into force of an 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: E-Administration Act), the client's legal representative pursuant to Section 9 (1) (b)

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.) 45 / 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.

If the Applicant does not duly prove the fulfillment of the required obligation, the Authority shall

considers that it has failed to fulfill its obligations within the prescribed period. The Ákr. According to § 132, if the debtor

has not complied with an obligation contained in the final decision of the authority, it shall be enforceable. The Authority decision of the Ákr. Pursuant to Section 82 (1), it becomes final with the communication. The Ákr. The Ákr. Under Section 133, enforcement is the decision, unless otherwise provided by law or government decree ordering authority. The Ákr. Section 134 of the Enforcement - if law, government decree or in the case of a municipal authority, a decree of a local government does not provide otherwise carried out by a state tax authority. Infotv. Pursuant to Section 60 (7) in the decision of the Authority to perform a specific act, conduct or tolerate a specific act to stop aimed at obligation with regard to the decision implementation the Authority.

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, February 6, 2020 "6"

Dr. Attila Péterfalvi

President

c. professor