

Case number: NAIH / 2020/1149/2.

History: NAIH / 2019/1834.

Subject: Rejection of the application

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

at the request of the applicant ([...], hereinafter referred to as the Applicant) with [...] Kft. ([...], represented by [...]

psychologist expert; hereinafter referred to as the "Requested")

make the following decisions in the proceedings.

I. In the decision of the Authority

I.1. rejects the Applicant's request to exercise the right of access;

I.2. ex officio finds that the Applicant did not provide adequate information to the

Applicant in connection with the exercise of his rights as a data subject and obliges him to provide a

Applicant shall be provided with adequate information regarding the release of his or her personal data

rejection;

I.3. a I.2. due to the violation established in point 1, the Applicant - with another data protection

in the event of a finding of an infringement, the present infringement as

will take the history into account with increased weight - ex officio and

gives a warning.

II. In view of the fact that the administrative time limit has been exceeded, the Authority shall, by order,

HUF 10,000, ie ten thousand HUF, to the Applicant

by bank transfer or postal order.

I.2. The applicant shall be required to take the measure provided for in paragraph 1 from the time the measure is taken

You must provide proof in writing within 15 days, together with 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 of the Authority set out in point I,

but within 30 days of service, by application to the Metropolitan Court

may be challenged in an administrative action. The application shall be submitted to the Authority, electronically, which forwards it to the court together with the case file. To hold a trial the application must be indicated in the application. Those who do not benefit from full personal exemption The fee for the court review procedure is HUF 30,000, subject to the right to record material fees fall. Legal representation is mandatory in proceedings before the Metropolitan Court.

The Authority II. There is no place for an independent remedy against the order under point 1, it is only the case may be challenged in an appeal against a decision on the merits.

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EXPLANATORY STATEMENT

I. Procedure and clarification of the facts

I.1. In his application received by the Authority on 08 February 2019, the Applicant stated that the Central District Court of Pest (hereinafter: the PKKB) was an expert on behalf of the Applicant.

before [...]. He was the subject of a pending psychological opinion [...].

number. The Applicant received the expert opinion, however, the underlying study nor psychodiagnostic data.

The Applicant sent a letter to the Applicant dated 10 January 2019, requesting that the Applicant provide him with the report relating to him, sound recording, data and when and to whom transmitted.

The Applicant also attached the reply letter of the Applicant dated 30 January 2019, in which the Applicant informed him that "Act XXIX of 2016 on Judicial Experts. Act (a hereinafter: Szaktv.), the forensic expert must block the personal data processed by him or her after the secondment. The Act Pursuant to Section 42 (2), the purpose of the blocking is to ensure the verifiability of the professional, methodological, disciplinary and legal compliance of the activities of the forensic expert, and to may be issued only in connection with those purposes.

It follows that I may not lawfully disclose the data you have requested, in the absence of the purpose of the processing

indicated above (as you are not entitled to such verification). '

In addition, in paragraph 2 of the Applicant's letter, he informed the Applicant that a

Szaktv. Pursuant to Section 42 (5), it is up to the decision of the seconding body whether the data management information

can be provided, therefore the Applicant will contact the seconding PKKB. "As long as the

court does not make a statement on this matter, I cannot lawfully provide the information you have requested

Who."

Subsequently, by letter dated 3 February 2019, the Applicant applied to the Authority.

At the request of the Applicant, on the right to self-determination of information and freedom of information

2011 CXII. Pursuant to Section 60 (1) of the Act (hereinafter: the Information Act) NAIH / 2019/1834.

case data was initiated on February 9, 2019.

I.2. In his / her application, the Applicant did not indicate the place and date of birth from the natural personal identification data

necessary for his / her identification, he / she did not clearly indicate the presumed

did not submit a firm request to the Authority,

because the request was addressed to the controller. Therefore, the Authority issued NAIH / 2019/1834/2. registration number

In his order, the petitioner was summoned to rectify the deficiencies, the deadline of which expired on March 6, 2019.

I.3. The Applicant received the letter of 12 March 2019 from the contents of the call for rectification

informed the Authority that it could not receive the letter until 03 March 2019 and

requested that the time limit for performance be calculated from that date.

In its reply, the Applicant informed the Authority that [...] acting on behalf of

asks to be obliged to provide "my OWN personal data, my own documents,

send me a copy to me ".

I.4. The Authority subsequently adopted NAIH / 2019/1834/4. by order no.

to send the Authority a copy of the request sent to the PKKB,

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and, if a reply has been received, a copy thereof. In addition, he asked the

He requested to be informed that [...] in connection with expert opinion no

what other documents containing the Applicant's personal data have been prepared.

I.5. The Applicant complied with the letter of formal notice by letter received on 15 April 2019.

It informed the Authority that, following the Authority's call, it had immediately contacted the PKKB, which had not been held before due to an administrative impediment, and that its failure to do so had been addressed to the PKKB.

Upon receipt of a request from an authority, it was detected. The Applicant attached a copy of the request submitted to the PKKB, according to which the request is dated 09 April 2019 and dated April 2019.

It was submitted to the PKKB on the 10th.

The Applicant also informed the Authority of the additional comments required related documents were prepared.

These are:

- ☐ confirmation to the secondee of the acceptance of the secondment,
- ☐ summons to the persons to be examined,
- ☐ outline of the expert opinion (contains template elements),
- ☐ study report (handwritten, note-taking),
- ☐ audio recording of the exploration,
- ☐ test reports, results,
- ☐ an expert opinion describing the results of the study, based on the outgoing expert opinion,
- ☐ outgoing expert opinion,
- ☐ tariff list.

The Applicant also explained that, in his opinion, it had arisen during the secondment, listed

Some of the documents also contain the expert's own personal data.

Section 42 (2) completely precludes the Applicant from receiving it during the expert examination

processed data. According to that provision, the expert shall block the personal data

only the professional, methodological and disciplinary adequacy of the expert activity, and

for the purpose of verifying its legality.

The Act Section 42 (5) - (6) does not only preclude the person concerned from receiving it from the expert

personal data processed by the expert during the procedure, but also on the processing of personal data

shall also make the provision of information subject to the authorization of the posting authority.

On the basis of these, in my view, [...] acted lawfully when it came to the expert opinion

refused to disclose the documents generated in connection with it and would have been damaged at that time

legislation if the data had been released.

Documents not containing personal data generated during the expert activity a

Szaktv. Section 40 (2), documents containing personal data are subject to the provisions of Art. Section 42 (2)

may not be issued pursuant to paragraph 1, or the latter only for a reason specified by law,

and to the persons specified therein, and in the present case one of those requirements

nor was it fulfilled. "

I.6. The Authority issued Regulation NAIH / 2019/1834/6. by order no. of 30 April 2019

procedure in accordance with CL of 2016 on General Administrative Procedure. Act (hereinafter: Act)

pending a decision on the preliminary issue, ie a decision by the PKKB.

I.7. In a letter received on 6 May 2019 during the period of suspension, the Applicant inquired why he would not be able to receive information regarding his own personal data.

I.8. In its order No [...], annexed to the PKKB's letter of 22 May 2019,

CXXX of 2010 on legislation. pursuant to Section 15 (2) of the Act (hereinafter: Jat.)

XLVII of 2005 on the activities of forensic experts. Act (a

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hereinafter: Old Act) 12 / B. § (5), he gave the instruction that the person concerned

'The right to self-determination of information and freedom of information, a

data processed by an expert (including data transmitted, data generated during an investigation,

the source of the data, the purpose of the processing, the legal basis, the duration, the name, address and

data processing activities, and - the transfer of the data subject's personal data

the legal basis and the recipient of the transfer)

authorize. "

I.9. The decision of the PKKB was also sent to the Authority, attached to the letter received by the Applicant on 30 May 2019.

I.10. The Authority issued Regulation NAIH / 2019/1834/10. In his order no., he invited the Applicant to make a statement as to when and with what content he had notified the Applicant of the refusal of access after receiving the PKKB's order.

I.11. By letter dated 2 October 2019, the Applicant informed the Authority that in his opinion it was not the task of the expert to "serve the court order on the party", nor stated that the PKKB's order had not been communicated to the Applicant, citing that "such NAIH / 2019/1834/4. nor was it included in his order.

II. Applicable legal provisions

Pursuant to Article 2 (1) of the General Data Protection Regulation, the processing of data in the present case is general data protection regulation applies.

According to Article 4 (1) of the General Data Protection Regulation, personal data are "identified or any information relating to an identifiable natural person ("data subject") (...)".

According to Article 5 (1) (a) of the General Data Protection Regulation, "personal data must be handled lawfully and fairly and in a manner that is transparent to the data subject ("Legality, fairness and transparency")".

According to Article 12 (3) of the General Data Protection Regulation, "The controller is unjustified without delay, but in any case within one month of receipt of the request inform the data subject in accordance with Articles 15 to 22. on the action taken in response to a request under Article. Need In view of the complexity of the application and the number of applications, this time limit shall be extended by two additional periods

may be extended by one month. The extension of the deadline by the data controller shall be the reasons for the delay within one month of receipt of the request. If the person has submitted the application electronically, the information shall be made possible, if possible, electronically unless otherwise requested by the data subject. "

Pursuant to Article 12 (4) of the General Data Protection Regulation, if the controller does not do so measures at the request of the data subject, he shall inform the data subject of the measure

the factual and legal reasons for the failure to do so and the fact that the person concerned may lodge a complaint before a supervisory authority and may exercise its right of judicial review. Article 12 (5) information pursuant to Articles 13 and 14 and Articles 15 to 22 and 34 the measure shall be provided free of charge.

According to recital 63 of the General Data Protection Regulation, "The data subject is entitled to access the data collected on him (...)"

According to Article 12 (1), (3) and (4) of the General Data Protection Regulation, "1. The controller shall take appropriate measures to provide the data subject with personal data all the information referred to in Articles 13 and 14 and Article 34

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in a concise, transparent, comprehensible and easily accessible form, in a clear and comprehensible manner, in particular any address addressed to children for information. Oral information may be provided at the request of the data subject, provided otherwise the identity of the data subject has been established.

3. The controller shall, without undue delay, but in any case upon receipt of the request, inform the data subject within one month of the following an application under Article measures. If necessary, taking into account the complexity of the application and the number of applications, this period may be extended by a further two months. The extension of the time limit is the controller shall indicate the complexity of the request and the number of requests, indicating the reasons for the delay, that is the time limit may be extended by a further two months. The extension of the deadline is the responsibility of the data controller within one month of receipt of the request, stating the reasons for the delay inform the data subject. If the application has been submitted by electronic means, the information shall be provided if possible, by electronic means, unless otherwise requested by the data subject. If the controller does not act on the data subject 's request without delay, but shall inform the data subject no later than one month after receipt of the request

the reasons for not taking action and the fact that the person concerned may lodge a complaint with one of the supervisory authority and may exercise its right of judicial review. "

According to Article 15 (1) (f) of the General Data Protection Regulation, "the data subject shall have the right to receive feedback from the data controller regarding the processing of your personal data is in progress and if such data processing is in progress, you have the right to access your personal data and have access to the following information:

(f) the right to lodge a complaint with a supervisory authority. "

According to Article 15 (3) of the General Data Protection Regulation, the controller is the data controller provide the data subject with a copy of the personal data Requested by the data subject for additional copies, the data controller shall charge a reasonable fee based on the administrative cost you can charge.

According to Article 23 (1) (i) of the General Data Protection Regulation, "The controller or

Union or Member State law applicable to the processor may restrict the

12-22. Articles 12 and 34 and Articles 12 to 22. with the rights set out in Article

the rights and obligations set out in Article 5 in

obligations if the restriction respects fundamental rights and freedoms

necessary and proportionate measure to protect the following

in a democratic society: the protection of the data subject or the rights and freedoms of others

protection '.

According to Article 58 (2) of the General Data Protection Regulation: "The supervisory authority shall be corrective acting under the authority of:

(a) warn the controller or processor that certain of its intended processing activities are likely to infringe 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; "

According to Article 77 (1) of the General Data Protection Regulation, "other administrative or

without prejudice to judicial remedies, any data subject shall have the right to lodge a complaint with a supervisory authority (...) if he or she considers that the processing of personal data concerning him or her infringes this Regulation. '

Infotv. According to Section 2 (2), "the General Data Protection Decree shall apply with the additions contained therein".

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Infotv. According to Section 60 (1), "the exercise of the right to the protection of personal data

In order to do so, the Authority shall, at the request of the data subject, initiate data protection authority proceedings and may initiate ex officio data protection authority proceedings.

Unless otherwise provided in the General Data Protection Regulation, data protection was initiated upon request CL of the General Administrative Procedure Act 2016. The provisions of the Act (hereinafter: the Act) shall apply with the exceptions specified in the Infotv ".

Infotv. According to Section 60 (2), "Application to initiate official data protection proceedings it may be submitted in the case specified in Article 77 (1) and Section 22 (b) of the General Data Protection Regulation ".

Infotv. According to Section 22 (b), "in order to enforce his rights, the data subject shall As specified in this Chapter, the Authority may request the conduct of official data protection proceedings if, in its opinion, the the data controller or the data processor acting on its behalf or at its disposal violates the the processing of personal data laid down by law or by a binding act of the European Union. "

The Authority shall inform Infotv. With regard to Section 61 (1) (a), the General Data Protection Decree It may apply the consequences provided for in Article 58 (2).

Infotv. 75 / A. §, the Authority shall exercise the powers provided for in Article 83 (2) to (6) of the General Data Protection Regulation, taking into account the principle of proportionality, in particular by:

whether the processing of personal data is mandatory or required by the European Union in the case of a first-time breach of the requirements set out in its legal act in accordance with Article 58 of the General Data Protection Regulation by alerting the controller or processor.

Infotv. 71 / A. § (1) In data protection and non-litigation proceedings for the adoption of a court decision (hereinafter: the main proceedings), a data protection objection (hereinafter: objection).

(3) An objection may be lodged in writing with the court seised of the main proceedings.

addressed to the competent court.

(4) The party, the accused and the other party to the proceedings, in particular the victim,

the private party, the witness and the expert - and the person entitled who has a legal interest in bringing proceedings at the same time as the opposition is lodged. '

Act XXIX of 2016 on forensic experts. Act (hereinafter: the Act) on the Applicant

According to Article 42 in force at the time of the submission of the application sent to the applicant:

'(1) An expert shall process personal data in the course of his or her activities, unless otherwise provided by law shall be blocked immediately upon completion of the secondment or execution of the order.

2. Upon completion of the secondment or assignment, the expert shall be responsible for the

blocked personal data in accordance with paragraph, the activities of professional, methodological, disciplinary from blocking in order to verify its compliance and legality

for a period of ten years from the date of entry into force of this Regulation

disciplinary proceedings against him and the procedure on which the forensic expert's assessment is based and another body or person authorized to process personal data

you can forward it to.

(5) The expert is the Law on the Right to Self-Determination of Information and the Freedom of Information

the issuance of information on the data subject's data processed by the expert

refuse to prevent or prosecute the offending or commissioning offenses; and

to protect the rights of the data subject or others.

(6) Data transmitted to an expert during an investigation shall be deemed to be data pursuant to paragraph (5)

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generated data, source of data, purpose, legal basis, duration of data processing, data processor

name, address and activity related to the processing, and - the personal data subject

in the case of transfers of personal data, the legal basis and the recipient of the transfer ".

The Act Section 42, effective from 26 April 2019, brought in line with the provisions of the GDPR

according to:

'1. The processing of personal data by an expert in the course of his activities shall be subject to the law unless otherwise provided - after termination of the secondment or execution of the order immediately.

2. Upon completion of the secondment or assignment, the expert shall act in accordance with paragraph 1 limited handling of personal data activities professional, methodological, disciplinary from the restriction in order to verify its compliance and legality for a period of ten years from the date of entry into force of this Regulation disciplinary proceedings against him and the procedure on which the forensic expert's assessment is based and another body or person authorized to process personal data you can forward it to.

5. The expert shall have access to the personal data of the data subject concerning the data which he / she processes refuses to exercise his right to prevent or prosecute criminal offenses by the posting or commissioning authority to protect the rights of the data subject or others.

(6) Data transmitted to an expert during an investigation shall be deemed to be data pursuant to paragraph (5) generated data, source of data, purpose, legal basis, duration of data processing, data processor name, address and activity related to the processing, and - the personal data subject in the case of transfers of personal data, the legal basis and the recipient of the transfer. "

A Jat. According to Section 15 (2), "The statutory provision - unless otherwise provided by law under its scope

(a) the facts and legal situation which have arisen; and
(b) proceedings instituted

it shall continue to apply after the expiry of the legal provision. "

Act XLVII of 2005 on the Activity of Forensic Experts. Act ('the Old Law')

Szaktv.) 12 / B. § (5) "The expert shall inform the data subject of self-determination

under the Act on the Right to Freedom of Information and the Freedom of Information (hereinafter: the Info Act), a

data handled by an expert (including data transmitted, data generated during an investigation, the source of the data, the purpose of the processing, the legal basis, the duration, the name, address and activities related to data processing, and - the personal data of the data subject the legal basis and the recipient of the transfer) to prevent or prosecute the offending or to protect the rights of others. "

The Old Act According to Section 13 (1) (l), "the secondment must contain - justified

in that case, the secondment of the secondee to the person concerned

Infotv. shall refuse to provide information in accordance with

The Ákr. § 51 (b), "if the authority exceeds the administrative time limit - and

there was no place to make a decision - it pays ten thousand forints to the applicant client, who shall also be exempt from payment of procedural costs. "

III. Decision

III.1. Rejection of the request for the release of the Applicant's personal data

By letter dated 10 January 2019, the Applicant requested the Applicant to provide him with the the relevant minutes, sound recordings, data and personal information

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on the transfer of data. In its reply letter dated 30 January 2019, the Applicant informed the Applicant that he had applied to the PKKB as a seconding body. Section 42 (5) in order to comply with your request for access.

In its firm request sent at the request of the Authority, the Applicant requested the instruction of the Applicant release your personal information.

The Applicant complied with the request from the PKKB which sent him and from the PKKB's reply.

dependent on the Act. In accordance with Section 42 (5), of which he was informed within the prescribed time limit the Applicant, however, did not confirm in a letter to the Applicant that it had sent the PKKB the request. The Applicant did not wait for a response from the PKKB, but turned to the Authority. THE

In response to a request from the Authority, the applicant provided information that the PKKB

due to an administrative impediment, the failure to comply with the request of the Authority was detected and replaced immediately upon receipt.

In its order No [...], the PKKB Referring to Section 15 (2), the Old Act 12 / B. § (5)

issued an instruction to refuse to release the information pursuant to paragraph

restrictive legislative measures by Member States under Article 23 of the Data Protection Regulation compatible.

The Authority will therefore request the release of the Applicant's personal data rejected in part.

At the same time, the Authority draws the Applicant's attention to the Infotv. 71 / A. § on data protection the institution of objection on the basis of which the data processing operations carried out by the courts the court seised of the main proceedings.

III.2. Informing the Applicant

The Authority examined of its own motion whether the Applicant had provided adequate information a When refusing to issue a copy of the applicant's personal data.

According to Article 12 of the General Data Protection Regulation, the controller must inform the data subject a 15-22. the action taken on a request pursuant to Article 1 or, if no action is taken, the reasons for not taking action and the means of redress.

The Applicant addressed the Applicant by letter dated 10 January 2019, the Applicant's reply Dated 30 January 2019 and the Applicant applied to the Authority on 3 February 2019.

Based on the above, however, the Applicant did not go beyond the general data protection regulation at that time provided the Applicant with a false information,

when he refused to comply immediately with his request on the grounds that he had sought the data

the PKKB with regard to its issuability. At the request of the PKKB, only on 10 April 2019, a

took place after the initiation of the official procedure and the 30-day time limit had already been exceeded despite this, the Applicant was not informed of his rights of appeal.

On the basis of the above, the Authority found of its own motion that the Applicant had not provided adequate information

information in connection with the exercise of the rights of the Applicant concerned when replying falsely claimed that he had contacted the authority which had sent him, the PKKB, or that he had not nor did it inform the Applicant of his right to appeal.

The Authority requested information from the Applicant that it intended to release the data in the possession and knowledge of the PKKB's decision, informed the

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Applicant. The Applicant informed the Authority that "it had sent to the NAIH

The PKKB's order was not described in any other way. " "Elsewhere, that's the phrase

- that [...] must notify the Applicant of the contents of the PKKB's order - the

NAIH / 2019/1834/4. nor was it included in his order '.

In the said order, the Authority did not issue the PKKB order to the Applicant

requested information on the sending or provision of information on the content of the

responding to data subjects' requests under Article 12 of the General Data Protection Regulation

compliance with the requirements. Article 12 of the General Data Protection Regulation requires the controller to a

if it fails to take action, it shall respond to the request of the data subject submitted to it

inform the data subject, inter alia, of the failure to take action in the present case

the refusal of the request for access and the reasons therefor. This is a statutory obligation

- to which the Authority does not have to call the data controller separately - the Applicant did not comply.

On the basis of the above, the Authority found that the Applicant had violated the untrue content

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

the principles of legality, due process and transparency and the absence of the Applicant

informed of his right to appeal or in possession of the PKKB's order at his request

Article 12 (4) of the General Data Protection Regulation

Based on.

III.3. Ex officio sanction and justification

A III.2. Establishment of a legal sanction for an ex officio infringement detailed in point

which the Authority, acting in accordance with its statutory discretion, has become necessary

me.

The Authority examined of its own motion whether a data protection fine against the Applicant was justified.

imposition. In this context, the Authority referred to Article 83 (2) of the General Data Protection Regulation, Infotv.

Section 61 (4) (b) and Infotv. 75 / A. § considered all the circumstances of the case.

The Authority found that the data processing of the Applicant violated the general data protection

legality, due process and transparency as set out in Article 5 (1) (a) of this Regulation

and Article 12 (4).

In the light of the circumstances of the case, the Authority found that it had been identified in the present proceedings

in the case of an infringement, the warning is proportionate and the commission of a similar infringement in the future

dissuasive sanction and therefore future compliance with the General Data Protection Regulation

to take, enforce and comply with precautionary measures on instructions - instead of fines

applied a warning.

In the course of the procedure, the Authority exceeded the Infotv. 60 / A. § (1) is one hundred and twenty days

administrative deadline, therefore Ákr. Pursuant to Section 51 b), it pays ten thousand forints to the Applicant.

ARC. Other issues

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 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), the Authority

The administrative lawsuit against the decision of the Criminal Court falls within the jurisdiction of the court. Section 13 (11)

The Metropolitan Court shall have exclusive jurisdiction pursuant to On civil procedure
on the 2016 CXXX. Act (hereinafter: Pp.) - the Kp. Pursuant to Section 26 (1)
applicable - legal representation in a lawsuit falling within the jurisdiction of the tribunal pursuant to § 72
obligatory. Kp. Pursuant to Section 39 (6), unless otherwise provided by law, the application
has no 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. Section 9 of the Act
Under paragraph 1 (b), the client's legal representative is required to communicate electronically.

The time and place 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.) 45 / A. § (1). From the advance payment of the fee is
Itv. Section 59 (1) and Section 62 (1) (h) shall release the party instituting the proceedings.

If the obligated customer does not adequately demonstrate compliance with the required obligations, a
The Authority considers that it has not complied with its obligations within the time allowed. The Ákr. Section 132
if the debtor has not complied with the obligation contained in the final decision of the authority, the
executable. The decision of the Authority Pursuant to Section 82 (1), the communication shall become final
becomes. The Ákr. Section 133 of the Enforcement - unless otherwise provided by law or government decree
ordered by the decision-making authority. Infotv. Pursuant to Section 60 (7), the Authority
to carry out a specific act, to behave
enforcement of the decision in respect of the obligation to tolerate or cease
Authority.

Budapest, March 11, 2020

Dr. Attila Péterfalvi

President

c. professor