

File number:

NAIH-1047-21/2022.

Object:

part of the request

affirmative decision

H A T A R O Z A T

The National Data Protection and Freedom of Information Authority (hereinafter: Authority) [...] (a

hereinafter: Applicant) at the request of [...] (address: [...]; tax number: [...]; hereinafter: Applicant)

against the publication [...] published by the Applicant (ISBN: [...] [print], [...] [pdf]);

URL: [...]; hereinafter: Publication) started to investigate its data management related to the Applicant

makes the following decision in a data protection official procedure:

1. The Authority to the Applicant's request

partly agrees

1.1. and finds that the Respondent has violated Article 5 of the General Data Protection Regulation

point a) of paragraph (1);

1.2. the Authority rejects the Applicant's request in other parts.

2. The Authority ex officio determines that the Respondent has violated the general data protection law

Article 21 (4) of the Decree.

3. The Authority due to the established infringement

3.1. is instructed based on Article 58 (2) point d) of the General Data Protection Regulation

You are requested to harmonize your data management operations e

decree

with its provisions, in the future the data processing shall be based on the same legal basis and the data subject

about his right to object in accordance with the provisions of the General Data Protection Regulation

provide information.

There is no place for administrative appeal against this decision, but from the announcement

within 30 days with a claim addressed to the Capital Tribunal in a public administrative case

can be attacked. The statement of claim must be submitted electronically<sup>1</sup> to the Authority, which is the case

forwards it to the court together with its documents. The request to hold the hearing must be indicated in the statement of claim

must For those who do not benefit from the full personal tax exemption, the administrative court fee

HUF 30,000, the lawsuit is subject to the right to record a material levy. In the proceedings before the Metropolitan Court, the

legal

representation is mandatory.

<sup>1</sup> <https://www.naih.hu/kozig-hatarozat-birosagi-felulvizsgalata> - At the initiation of the administrative lawsuit, NAIH\_K01

a form called

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I N D O C O L A S

I. Procedure and clarification of the facts

I.1 History

The following exchanges of letters took place between the Respondent and, through its legal representative, the Applicant.

The personal data of the Applicant on November 26, 2021 to natural persons

regarding its protection and the free flow of such data, as well as a

Regulation (EU) 2016/679 on the repeal of Directive 95/46/EC (hereinafter:

14 of the General Data Protection Regulation) informed the Applicant in writing personally

about the management of your data.

In his letter, the Respondent provided information about the Person, address and

availability.

The requested legal basis for data management is primarily Article 6 of the General Data Protection Regulation (1) point e) in view of the fact that the Respondent as a non-profit foundation works, its purpose is, among other things, to map corruption problems, to inform the public, that is checking and facilitating the fulfillment of transparency requirements, in particular with regard to public funds for use. The Publication serves this purpose, thus it implements an activity of public interest yes.

The respondent indicated general data protection as a secondary legal basis for data management Regulation Article 6 (1) point f) and the European Convention on Human Rights (a hereinafter: ECHR) Article 10. In this round, he submitted that the Respondent carried out an interest assessment, as a result of which he found that freedom of expression, public funds investigation of its transparency, possible abuses and cases of corruption to the public making, informing the public on the one hand about the spending of public money, and on the other hand, the Applicant legitimate interests that form the basis of the processing of personal data against his protection. He added that all of the processed personal data was previously is based on published and currently available newspaper articles. According to the applicant's point of view furthermore, data management is necessary and proportionate, since without the management of personal data a expression of opinion and information as a goal would fail. Proportionality in the Publication the nature of the described cases is justified by the nature of public affairs, as the performance of public functions and public funds handling and spending it is associated with an increased tolerance obligation.

He indicated the following categories of personal data: name, financial situation, economic interests, relative's state mandate, business activities with relatives, orders with public money obtained through corporate interests and received from public money subsidies, property ownership.

He named Hungarian society and international public opinion as the recipients of the personal data

the Applicant.

You provided the following URL links as the source of your personal data:

[...]

[...]

[...]

[...]

[...]

[...]

[...]

[...]

[...]

[...]

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2

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[...]

[...]

[...]

[...]

[...]

-

Regarding the duration of storage of personal data, the respondent explained that it is not  
can be determined as the handling of personal data in the editing and publishing of a book  
Is manifested.

Finally, he informed the Applicant that he has the right to request access to personal data,  
their correction, deletion, restriction of processing, and the processing of personal data can be objected to  
against. He also informed that with his complaint about data management to the Authority and  
you can go to court.

On December 2, 2021, the Applicant objected to the data management and called on the Applicant to  
not to process your personal data, and to refrain from publishing personal data in the Publication  
from its publication or disclosure in any other way.

The applicant explained that the publication in the Publication is seriously offensive and misleading, a  
planned content in some cases reports untrue facts about the Applicant, false facts  
so that the publication of the Publication would cause a significant harm to interests. The Publication is like that  
is based on articles, some of whose statements are untrue, real facts are misrepresented,  
furthermore, they contain information that is not relevant or current, thus  
they have no news value either, they only discuss private or tabloid-level information. THE  
Based on this requested information, it is in a context more harmful to the Applicant  
by publishing it would claim that the Applicant in the most serious corruption cases of recent years  
took part. The Respondent would put the data in a new context and it is so baseless and untrue

would draw conclusions from them, which would cause significant damage to the interests of the Applicant.

In relation to point e) of Article 6 (1) of the General Data Protection Regulation, as a legal basis Applicant

submitted that it does not exist in the case of the Applicant. In this context, the Authority referred

NAIH/2020/838/2. and NAIH/2020/1154/9. to its resolutions no., which state that point e)

according to the legal basis for data processing related to a public task classified as such by a law

activities, and the Respondent's employees cannot be considered as performing a public duty

to a person. The Publication cannot be considered a public interest activity because it is not specific

is related to an event, it is not fact-finding and investigative work, nor does it seek to

to give a factual picture of the Applicant.

In relation to point f) of Article 6 (1) of the General Data Protection Regulation, he explained that a

It is clear from the respondent's letter that, if he did attempt to weigh the interests,

did not do it properly. In the evaluation of the applicant's interests, only his own perceived or real interests are considered

refers to his interests, without mentioning the interests of the Applicant,

so the done incorrectly

as a result of consideration of interests, it is not possible to come to the conclusion that the Respondent is legitimate

interest outweighs the disadvantages for the Applicant, as a result of which the Data Management is Requested

it cannot take place on the basis of his legitimate interest. The applicant added the general data protection regulation

does not provide the possibility for the data controller to have a legal basis for the same data management

switch and set alternative legal grounds in case the main legal ground fails.

In connection with the disclosure of the data, he referred to the European Court of Human Rights (a

hereinafter: ECJ) 931/13. and 0454/07. No. judgments, on the basis of which it is an information

publicly available does not necessarily exclude it from the protection of Article 8 of the ECHR. And that it is

The ECHR and the Court of Justice of the European Union (hereinafter: CJEU) also stated that privacy

balance between the right to respect and the right to freedom of expression

the correctness of the published information is of particular importance.

According to the Applicant, the Respondent did not comply with Article 13 of the General Data Protection Regulation

(1) point e), since instead of "Hungarian society and foreign public opinion", it is specific

recipient circle should have been indicated.

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According to the applicant, data management violates Article 5 (1) paragraph b) of the General Data Protection Regulation and also the principles of data saving and purpose limitation defined in point c).

The applicant also stated that he does not qualify as a public figure, as he does not assume a role in public life and he does not wish to influence public opinion with his activities, just his status and his father existing blood relationship does not establish the quality of a public figure.

Finally, the applicant repeated his protest based on Article 21 of the General Data Protection Regulation.

In a letter dated December 6, 2021, the Respondent responded to the Complainant's protest and sent the individual interest assessment. In connection with its data management conditions, it submitted that the Publication is and the Applicant is called upon to present cases of a corruption nature deemed by him to be the most harmful your personal data will be processed in this context. The applicant lists again in November 2021 URL links, which are the source of the personal data, also included in the letter sent on the 6th they point to significant articles, as well as the range of personal data handled.

The legal basis for data management is primarily Article 6 (1) of the General Data Protection Regulation indicated a task of public interest according to point e), "in view of which no prior individual for consideration of interests." It operates as a requested non-profit foundation, its purpose is, among other things, anti-corruption

mapping of such problems, informing the public, purchases related to transparency

verification of its fulfillment with particular regard to public funds, so the Respondent is general

its obligation clearly serves the public interest. Requested "this general activity

prepares and makes public the referenced publication within the scope of which the Data Controller

explores the impact of the covid19 pandemic on tourism in Hungary, as well as the

what measures the Hungarian state has taken for tourism, which has been severely affected by the covid19 epidemic sector and who are the recipients of these measures."

Requested in view of domestic official practice, which is Article 6 of the General Data Protection Regulation prioritizes a legitimate interest according to point f) of paragraph (1), it deemed it necessary to perform it also a unique consideration of interests.

In connection with the legal environment, Article 6 (1) e) and f) of the General Data Protection Regulation was referred to points, point a) of Article 17, paragraph (3), paragraphs (1) and (2) of Article 85, (65) and (153) to recitals, IX of the Basic Law. to paragraphs (1) and (2) of Article 10 of the ECHR, the Infotv. Section 5 (1) point a) of the 2011 CLI on the Constitutional Court. law (a hereinafter: Abtv.) to paragraph (1) of § 39.

According to the respondent's point of view, "there can be no reasonable doubt" that Article IX of the Basic Law. article (1) and Article 10 of the ECHR, as well as the subject of their protection the enforcement of constitutional court decisions is considered to be a goal based on the public interest, for the purpose of which the processing of personal data is permitted.

The purpose of data management is to perform the public interest activities of the Respondent, as well as indicated the exercise of his right to express his opinion.

He presented the following as the context of data management. Belonging to the interests of the Applicant business company under the control of a relative of the Applicant [...] (hereinafter: [...])

at the expense of funds made available from public funds by another relative of the Applicant

[...] was bought with the help of a loan provided by the owned bank. E [...] is a farmer with more public money also fulfilled orders for the organization. The conflict of interest raised the suspicion that [...] a

It was also delivered to a building [...] run by a close relative of the applicant [...], which

was exempted from the public procurement obligation for reasons of national security. The Applicant

630 million forints in non-refundable state aid to the economic company belonging to his interests

received from European Union funds, as well as Hungarian state support in the amount of HUF 287 million.

Applicant by close relative

property

to obtain. In the interests of the Applicant



companies shortly that

they withdrew a significant part of their funds from this bank in advance, because the MNB is restrictive against it ordered measures.

received from owned bank

belonging to economic

mortgage loan

4

moreover it is

competent authorities

exercise of law. For all these

The Respondent justified the need for data management by saying that it is clear to the reader

be the Respondent's opinion and the circumstances underlying it, it is essential that

The applicant's personal data should appear in the Publication. According to the applicant's point of view

is concerned that the Applicant's influence from the public trust of his relatives and

he owes his business success to his information,

measure

initiated in view of the fact that the purchase of [...] delivered to the [...] building is for national security

was exempted from the public procurement procedure out of consideration. Without the listed data a

The requested opinion formation would not be followable, would not be comprehensible, and neither would the conclusion would be reasonable.

In terms of proportionality, the Respondent stated that the data management is complete with its purpose

is proportional to the extent, as it is exclusively personal, which is absolutely necessary according to the above handles data.

Regarding the applicant's interests, the applicant submitted that the processed personal data is numerous

contained in a newspaper article, so the data processing of the Respondent "does not constitute a novelty for the Applicant",

with regard to their publicity. The Applicant's interest is exhausted in that the Respondent does not

formulate a criticism of your person. However, this is not considered data management,  
but for the expression of opinion  
with respect to the public  
right to information, transparency of spending public funds, management of public funds  
the wish to check precedes the Applicant's interest in having his personal data  
should not be treated.

As a result of the consideration, the Respondent established that the Respondent  
his fundamental right to express his opinion is a stronger legitimate interest than the Applicant's right to data protection  
right, so the data processing is legal, necessary and proportionate.

On December 13, 2021, the Applicant repeatedly contacted the Respondent via electronic mail,  
in which he again objected to data management.

According to the Applicant's point of view, the Respondent is dated December 6, 2021  
from his letter

it can be established that the interest assessment was not carried out before the start of data processing. THE  
Interest assessment sent on December 6, 2021 is 10 days later than November 2021  
letter dated the 26th, in which he informed the Applicant that his data in the Publication  
is managed for the purpose of publication, the possible start date of which is any relevant information  
in its absence, it could not even be made probable. The sent is called "individual interest assessment".  
document raised additional concerns about the data management of the Respondent, since as  
that NAIH/2020/838/2. decision no

second consideration of interests. Based on the information sent by the applicant, the applicant a  
to a conclusion

found out that the Respondent had not completed the data processing  
consideration of interests, and the individual consideration of interests sent after the protest does not comply  
the requirements for the individual consideration of interests. According to the applicant, the data management  
opacity, the administrative obligations

lack of fulfillment is common

also violates the principle of accountability defined in Article 5 (2) of the Data Protection Regulation.

The applicant submitted that the individual interest assessment provided to him does not correspond to that

applicable warranty

content requirements. Referring to NAIH/2020/838/2. no

decision, specifically taking into account the circumstances presented in the protest request,

must be carried out by the data controller on a case-by-case basis, taking into account the rights and interests of the data

subject

in order for it to actually happen

consideration of the interests of the parties. E

requirements were not met by the Respondent's individual consideration of interests.

According to the applicant's point of view, in his letter dated December 2, 2021, he explained in detail that

circumstances on the basis of which the processing of your personal data would cause harm to your interests.

Requested

by disclosing information

accuses him of committing a crime, without any related procedure

would establish, moreover, the data management is also seriously illegal from a data protection point of view. The

no individual interest assessment carried out

form is not reflected by the Applicant

presented, does not even mention the cited reasons, the Respondent merely repeats the previous one

contained in your letter. It completely ignores individual interest considerations

half information and in false color

indicated

5

convicted of corruption

most harmful

part of it is the "balancing of interests", both "parties"

The interests of the applicant, he did not consider the consequences for him in the Publication appearance. THE

data management performed on the basis of superficial, general aspects

a consideration of interests that ignores its impact on the private sector does not meet the general requirements results in a violation of the requirements of the data protection regulation and the right to protest.

The Respondent's claim that data management is "nothing new" for the Applicant as well

supports the fact that the applicant's interests were ignored in the consideration of interests. Applicant in his protest, he pointed out that the Publication is not the one currently available - in part, anyway

is limited to gathering information that is untrue or misrepresenting facts,

but would place them in a new context and draw unfounded conclusions which

For applicant

would cause significant harm to interests. The individual interest assessment on it

finding that the Applicant's interest lies in the fact that the Respondent does not formulate

personal criticism, is also untrue. The Authority pointed out in its 2020 report: "it is

consideration of interests is central

it's legitimate

exploration and objective analysis of its aspects, so it is important to take this step carefully and

be done thoroughly by the data controller." Requested individual interest consideration such measurement, that is

it does not include conflicts of interests or factors, so it is contrary to the general data protection regulation

(69), paragraph (1) of Article 21, and the practice of the Authority. The

a unique consideration of interests is also contradictory, since based on the previous information, the Publication purpose of a

presentation of type cases, while the unique

in the consideration of interests, the Respondent indicated that the Publication is the covid 19 pandemic

its impact on tourism involves the measures taken by the Hungarian state in the sector

for its protection and who are the recipients of these measures. The articles published as sources are covid 19

they appeared before the epidemic, so they are not relevant to the stated goal. Because of this

The respondent did not comply with Article 14(1)(c) of the General Data Protection Regulation

of its specified obligation to provide information, as well as in point b) of Article 5 (1).

the principle of being tied to a specific goal is also violated.

The respondent's argument that his data processing is in accordance with Article 85 (1) of the General Data Protection Regulation

is subject to the processing of personal data for journalistic purposes according to paragraph

According to the applicant, it is completely incorrect. As the Authority 438-1/2021. no

also stated in its decision that journalistic activity is not covered by Article 6, paragraph 1, point e).

, i.e. there can be no question of data processing in the public interest. Also requested

does not qualify as a media service provider or press organization,

therefore, the Publication cannot be qualified either

CLXXXV of 2010 on media services and mass communication as a press product.

according to the law. In addition to the Publication, the Requested has repeatedly opposed the Organization

With the principles defined in the operating regulations, as well as in its voluntarily accepted Code of Ethics with reservations.

In view of the above, the Applicant once again strongly called on the Applicant to

refrain from disclosing your personal data publicly in the Publication or in any other way

and send him the part of the text you intend to publish.

The Respondent responded to the Applicant in a letter dated December 20, 2021. He presented that it is a unique assessment of interests was not made on December 6, 2022, it was only technically on that day for inclusion in the letter dated as a response to the letter sent for information by the Applicant.

To the best of the respondent's knowledge, the General Data Protection Regulation does not impose an obligation on the basis of which you must also send the specific assessment of interests.

The Respondent also submitted that the Applicant's first letter of protest did not contain such

a circumstance that would have substantiated the illegality of the data management. In the applicant's letter objection can be read against the result of the consideration of interests, however such facts and he did not present any circumstances that would have justified him being supplemented by the Respondent overrules the sender's individual interest assessment. As an example, he indicated that Applicant no presented a factual rebuttal regarding the content of the marked newspaper articles. Because he doesn't want to appear in the Applicant's Publication, it does not follow that the publication would be illegal.

He requested the Applicant's personal data in the previously sent information and that it is handled within the scope indicated in the interest assessment, for purposes and for legal reasons. He explained exhaustively the

announcements published in the press, from which findings and conclusions are derived

6

it's real

for use

not the enforcement of his right

form the basis of data management. In only one of the publications referred to in the press

no corrections were made either, so the Requested can reasonably assume that they were published there

they correspond to reality and fit within the framework defined by freedom of expression

between.

The applicant performs activities of public benefit while observing the legal requirements at all times, a

as defined in its founding document, it acts, among other things, to curb corruption and a

public funds are transparent

during the implementation of its public interest goals.

The applicant does not provide public benefits by providing media services or journalistic activities,

his activities serving the public interest, he did not even refer to this. However, this does not matter because

there is no provision according to which only journalism or media services and

CLXXXV of 2010 on mass communication. certain activities defined by law

in case of exercise, it would be allowed according to the provisions of Article 85 of the General Data Protection Regulation based personal data management. Article 6 (1) e) of the General Data Protection Regulation the content legal basis of data processing for public interest purposes based on the general data protection permitted by Article 85 of the Decree in the case of any person or organization may be the enforcement of the right to freedom of expression and information. That way the general data protection regulation on freedom of expression and the individual for information exclusively with journalism obsession

allows it to prevail through persons and organizations engaged in media services.

There is no legal obstacle to the Applicant's public interest goals and public benefit activities in order to provide it, within the framework allowed by the general data protection regulation, it exercises a his right to freedom of expression, of which the Applicant and others are part manage your personal data.

The Respondent also repeatedly drew the Applicant's attention to Kúria Pfv.20/849/2020/4. no to its "precedential" judgment, which, according to paragraph [21] of its justification, Applicant a it is considered a public actor to the extent of its share of public funds. Requested only Applicant in connection with its share of public funds, it is managed for the purpose of providing information about it your personal data. Applicant as a public figure with public appearance of his personal data in the context of handling and criticizing, he is burdened with an increased obligation of tolerance.

The respondent also indicated that the "Data Controller is investigating how the covid19 pandemic has an impact on tourism in Hungary, and what measures the Hungarian state has taken a in order to protect the tourism sector, which has been hit harder by the covid19 epidemic, and on this "who are the recipients of the measures" was included by mistake due to a text editing error in consideration of interests, for which the Applicant apologizes for the error.

The Applicant responded to the Respondent's letter by electronic mail on December 29, 2022.

He repeatedly and emphatically urged the Applicant that what he planned to publish was verbatim

send a text to

In his previous letter, the respondent referred in several places to the fact that it was "technical" or "wrong,

"text editing" errors occurred in your previous communication. In this round, the Applicant submitted that

The respondent, as a data controller and the organization intending to influence public discourse, is the data subjects

in the course of providing information, he was seriously negligent, with which not only his own person, but also that of others

and can seriously negatively affect your social perception. The concerned is preliminary and appropriate

information is essential so that, in accordance with the principle of transparency, you can get to know the

planned data management. The respondent violated the principle of transparency and accountability,

which he admitted in his last letter regarding the mentioned "mistakes". On the legal basis of your data processing

provided untrue information to the person concerned, thereby misleading him, is illegal

implements data management, because if the data management is not based on consent, it affects the data subject

information

also transparency and

principles of accountability, that the date of the "individual interest consideration" is not mentioned by the Applicant

in the letter sent by and, as it turned out later, the date at the end of the letter was "only

technically" is there. In order to carry out the actual, preliminary assessment of interests, the Applicant is required several

times

at his request and despite the legal obligation, there is no further evidence.

its content element is data management

legal basis. It offends

7

due to the data controller

Based on the explanation of the general data protection regulation, legality and transparency, as well as

from the principles of accountability

you must document it in writing



consideration of interests. In addition, the person concerned must be given the opportunity to be convinced about whether he took into account the interests and rights of the data subject, whether he actually carried out the consideration of interests.

Since the Applicant specifically disputed the results of the interest assessment in both protest letters, and requested the presentation of the consideration of interests, the fact is that the Respondent did not send it consideration of interests or its result, in itself violated legality, fair principle of procedure and transparency. The respondent also did not prove the general data protection on the basis of his obligation under Article 25 (1) of the Decree, that the rights of the Respondent take precedence over the rights and freedoms of the Applicant. Respondent Applicant he also apparently ignored her later protests.

Regarding legal grounds, the Respondent also referred to Article 6 of the General Data Protection Regulation to point e) of paragraph (1). The Applicant explained it earlier, but repeated that the Respondent did not has neither public interest nor public authority authorization for data management. The "public interest "task", the "public task" used in Hungarian law can be regarded as a guideline expression. In general, for the two subsystems of public administration, the state administration and the bodies within the scope of local government administration, or those established by legislation, as well as a bodies and persons with legally defined responsibilities would have a public duty.

It is also a public task if the state is a consultant in a matter affecting the integrity of a profession for the purpose of cooperation, it establishes a public body in such a way that it is organized as necessary for the performance of this task

and provides it with powers. A sectoral municipality that is the given profession can also perform a public task for its practitioners, it creates norms concerning the rules of the profession and sanctions them. E

legal basis for the processing of personal data necessary for the exercise of public authority

can be applied. In connection with the exercise of public authority, the general is also applicable

the provision of the data protection regulation on the basis of which the basis of data management is EU or member state must be determined by law. In connection with the exercise of public authority, it can be considered as a guideline

CXXVII of 2007 on general sales tax. the interpreter listed in Section 7 (2) of the Act

provisions. Based on the above, it can be clearly stated that Article 6 of the General Data Protection Regulation

The legal basis according to Article (1) point e) does not exist in the case of the Respondent.

The applicant also submitted that he is not a public figure and does not undertake public affairs in any form

role and does not wish to influence public opinion with its activities. Related status, one

his relationship with a public figure [...] does not establish his status as a public figure. The referenced

paragraph of the Curia decision, but the judgment itself does not contain anything similar to it

conclusions that the Applicant is a public actor to the extent of his share of public funds

it counts as. The articles sent by the respondent contain a number of items which

they have no connection with the possible share of public funds, but the Applicant

relate to his private sphere. Furthermore, the one who is in the state shows a bad faith attitude

considers the fact of support as realized corruption. Since the communication of the Applicant

is contradictory in many respects, the referred articles on the perceived or real fact of state support

also contain additional personal data, the Applicant repeatedly requested

You are requested to send the part of the Publication relating to the Applicant.

The Respondent's claim that the Applicant's first protest letter did not contain any is not true

a circumstance that would support the illegality of data management. Applicant clearly

and summarized the reasons for the illegality of data management in a well-structured manner. From the exchanges of letters

it turns out that the Respondent did not take the Applicant's objection into account. Applicant referred to the

Authority NAIH/2020/1154/9. decision, on the basis of which the task of the data controller is to identify the

stakeholder interests and rights, as well as NAIH/2020/838/2. to a decision based on which it is

to the data controller thoroughly, not just on the basis of criteria that can be considered general, specifically a

must carry out the individual interest assessment taking into account the circumstances presented in the protest.

In his electronic letter sent on January 7, 2022, the respondent stated that in his opinion

related to the processing of the Applicant's personal data, as explained exhaustively in their previous letters

his position, he exhaustively answered the concerns presented in this round, so he considers it unnecessary

to repeat the arguments with which he supported the legality of his data processing.

An extract of the content of the text of the Publication concerning the Applicant, without legal obligation, sent on a voluntary basis, broken down by topic:

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"1. The purchase of [...], which transaction was financed from the [...]credit program, the loan was taken by [...] up.

2. The purchase of [...] and then transfer to [...].

3. Individual orders of [...] from organizations managing public funds.

4. Suspicion of conflict of interest a

establishing the absence of a crime.

[...]

in connection with transport, police

accusation,

5. Initiation of proceedings before the Public Procurement Authority for violation of public procurement rules in connection, because [...] avoided the public procurement procedure for [...]

, Public Procurement Authority's decision stating the absence of illegality.

6. Non-reimbursable EU subsidies and Hungarian state subsidies of [...].

7. The mortgage loan of [...] and the withdrawal of funds from [...] the central bank restrictions directly before."

Finally, the Respondent asked the Applicant that, until the Publication is made public, the treat data confidentially.

In his letter dated January 17, 2022, the Applicant repeatedly asked the Applicant that the

Do not include your data in a publication or spread false information about it. The

maintains its arguments related to data management, expressed in its previous letters, and will not repeat them

wishes, but at the same time drew the Respondent's attention to the fact that there is still no meaningful answer to them

got

In connection with the claim of the respondent that he is not subject to a legal provision which would be obliged to send a verbatim copy of the text of the Publication Applicant, submitted that, based on Article 15 (3) of the General Data Protection Regulation, the data controller the personal data subject to data management belongs to the data controller make a copy available to the person concerned, thus repeatedly calling on the Applicant to send him the draft text.

With regard to point 1 of the content extract, the Applicant submitted that [...] nearly 40,000 domestic business benefited, so it is not considered extraordinary that a business is eligible for a preferential loan gets

In relation to point 2, the Applicant's position is that the acquisition of [...] and transfer to [...] to place its handover in a context with delayed corruption crimes, since a

The articles referred to by the respondent do not refer to the involvement of any official body in relation to a given case. The transaction was carried out between two private companies, which transaction no corruption arose based on the referenced articles or otherwise.

In relation to point 3, the Applicant submitted that [...] has been fulfilling state orders for almost 50 years, however, central purchases represent only 11-12% of its 2021 revenue. That one a business company takes part in a public procurement procedure, it does not in itself raise corruption his suspicions.

Regarding point 4, no criminal liability was established. Crime with regard to the procedures ending with the establishment of his absence, the Applicant is repeatedly accused of corruption to accuse him of committing crimes is in bad faith and harms the Applicant's reputation refers to a serious violation, as well as a serious abusive exercise of rights. [...] [...] is not [...] won, he only participated as a subcontractor in less than five percent of the market order basis.

The applicant emphasized that the Kúria EBH2018.B.19. on the basis of his decision to defame it is suitable to assert or publicize a fact which, in reality, constitutes a criminal or legal violation

may serve as the basis for initiating disciplinary proceedings against the victim. This point and the 5th and 7th in the case of points, the fact exists that an official procedure was initiated in the given case, during which the Applicant's responsibility was not established, so the Respondent's claims are honourable bad faith reports capable of impairing.

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If the Requested Party nevertheless publishes the Publication with the content created by the draft, the Act V of 2013 on the Civil Code (hereinafter: Civil Code) defined in § 2:45 reputation and honor, and Act C of 2012 on the Criminal Code (the hereinafter: Civil Code) 226-227. the legal facts of defamation and defamation found in §§ would make it happen. In this context, the Applicant referred to the provisions of the Court's decision BH2019, 118, on the basis of which "the court of second instance correctly explained that the statement was an untrue factual statement, which - given that it contained an unfounded accusation of a serious crime is considered a violation of the law, because it destroys both the plaintiff's self-esteem and public perception", and the In the Capital Court Pf.21.259/2018/3. to its decision no. which emphasized that "the suspicion with its publicity, the defendant portrayed the plaintiff as having committed a crime away, which was suitable for adversely affecting the plaintiff's social position and general perception influence."

In view of the above, the Applicant repeatedly called on the Applicant to terminate the unlawful data processing, refrain from including the Applicant in the Publication, and on the basis of Article 15 (3) of the General Data Protection Regulation, send it to him in the Publication to publish the literal version of the planned text.

In a letter sent on January 21, 2022, the Respondent informed the Applicant that previously considers his arguments to be valid and maintains his position.

I.2. Please

On December 29, 2021, the applicant submitted a petition to the Authority, in which data protection initiated official proceedings against the Applicant, given that it is the Applicant

he plans to publish a publication on "corruption-type matters deemed the most harmful", in which wishes to include the Applicant.

Applicant within the scope of the description of the specific behavior or state of the alleged violation presented the following:

On November 26, 2021, the respondent's legal director contacted him via electronic mail, in which he informed that he wished to include his personal data in the Publication.

The applicant - through his legal representative - protested in his letter dated December 2, 2021 against data management, referring to the fact that the Publication is based on articles that are individual articles its statements are untrue, real facts are presented in a false light, or it is simply not newsworthy

they discuss tabloid-level, rumor-like information. According to the applicant's point of view, a

In a publication, the Applicant would not only collect and present the already available information, but would place them in a new context and draw untrue conclusions from them which

It may cause significant harm to the applicant's interests, and which is related to data protection, privacy rights and even initiate criminal proceedings. In his protest letter, the applicant explained that it is

Article 6 (1) point (e) of the General Data Protection Regulation is not appropriate for the Respondent legal basis, as it does not carry out an activity in the public interest. Article 6 (1) indicated by the respondent he explained in relation to the legitimate interest designated as an alternative legal basis according to paragraph f).

Applicant, that in connection with it, he hardly carried out a consideration of the interests of the Applicant, since in that

The applicant's interests are not even mentioned. He also submitted that the general data protection

according to the decree, it is not possible to switch between legal bases. The applicant asked the applicant to send him the result of the due diligence test. He objected that by the Respondent

the recipients defined as "Hungarian society and foreign public opinion" are too abstract

to determine its scope, which thus violates Article 5 (1) of the General Data Protection Regulation

b) and c) the principles of data saving and purpose limitation. He emphasized

furthermore, that based on the current regulations, the Applicant is not considered a public figure.

On December 6, 2021, the applicant sent the document called individual interest assessment,

in which, according to the Applicant's point of view, he did not react in any way to what was previously presented, thus not for the express exercise of the right to protest.

The applicant protested again on December 13, 2021. Submitted to data management

The Applicant started without a balance of interests test, and neither did the individual balance of interests appropriate, as it essentially repeated the first without considering the contents of the protest

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described in his letter, so the balancing of interests did not take place either. The applicant has asked you to send him the part of the Publication relating to the Applicant.

In addition to the position maintained by the applicant in his answer dated December 20, 2021, a

the right to freedom of expression and the individual's right to information

he maintained his argument regarding the legality of data management with reference to its validity.

According to the applicant's point of view, in his letter he still did not give a substantive answer to the question that what compelling legitimate reasons justify the data management, which take priority

Against the applicant's interests, rights and freedoms.

In his letter dated December 29, 2021, the Applicant repeatedly drew the attention of the Applicant

to the violation of certain data management principles, as well as to the fact that no attempt is made to remedy them

it didn't happen on his part. He submitted that he presented those facts against the Respondent's claim

and circumstances that would have formed the basis for supplementing and overriding the consideration of interests.

He repeatedly drew the attention of the Respondent that Article 6 (1) of the General Data Protection Regulation

The legal basis of public interest according to paragraph e) cannot be applied to the Respondent,

and that he misinterpreted the Court's decision (Pfv.IV.20.849/2020/4.) and came to the conclusion that

The applicant would be a public figure. Finally, he repeatedly asked the Applicant to send the

The relevant part of the publication and refrain from illegal data processing.

The applicant attached to his submission a copy of the correspondence with the application, as well as the legal representative's power of attorney.

The Applicant sent it to the Authority on January 19, 2022. The Applicant sent it to the Authority on January 7, 2022

sent letter, as well as the Applicant's reply dated January 17, 2022.

The Authority NAIH-1047-2/2022. called the Applicant to fill in the gaps in his order no his request did not comply with the right to self-determination of information and freedom of information CXII of 2011 Act (hereinafter: Infotv.) as contained in Section 60 (5), which

The Applicant complied with the invitation on January 21, 2022.

The Applicant is in the scope of the alleged violation of the General Data Protection Regulation below marked its provisions:

- Article 5 (1) point a): The requested party handles the data in a non-transparent manner, the during the course of information, he acted incorrectly several times, according to his own admission, numerous times sometimes got into a self-contradiction;
- Article 5 (1) point b): The data management was not clearly defined by the respondent he provided contradictory information to the Applicant on several occasions regarding his purpose;
- Article 5 (1) point c): Personal data managed by the applicant in the Publication are not relevant, it contains many data that are otherwise self-contradictory unnecessary for data management purposes;
- Article 5 (1) point d): the personal data appearing in the Publication is unreliable source, their accuracy is not supported. Applicant on several occasions drew the attention of the Applicant to the fact that the articles used as sources are untrue facts contain and falsely present real facts, they are public its publication is extremely harmful to the Applicant;
- Article 5 (2): The Respondent could not prove that he had implemented the Publication in the course of data management, the basic principles of data management apply and that would have an appropriate legal basis for data management;
- Article 6 (1) points e) and f): No provision is made regarding the requested point e). with legal authority, and in terms of point f) the interest assessment test only apparently performed it, so the reference to legitimate interest does not stop either. Because of this



The data processing is carried out by the applicant without a valid legal basis for the personal data of the applicant regarding;

- Paragraphs (1)-(2) of Article 12: Transparency, comprehensibility and clarity are requested

he informed the Applicant not in accordance with his requirements, he contradicts himself several times, that is providing information that is not relevant in terms of data management. The applicant refused

Exercising the applicant's right of access and objection;

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- Article 14 (1) points c) and e): The applicant did not specify during the information

clearly the legal basis of data management and the scope of recipients of personal data;

- Article 15 (1) points a) and e): Requested about the purpose of data management and recipients did not adequately inform the Applicant about its categories;

- Article 15 (3): Respondent did not send the information about him despite the request of the Applicant a copy of the processed personal data, the text about the Publication Applicant is verbatim a copy;

- Article 17 (1) point (c): The applicant specifically and repeatedly objected to data processing against, in particular the disclosure of the part of the Publication concerning the Applicant against, as there is no priority right to data management, but the Respondent did not delete it personal data;

- Article 18 (1) point d): After the applicant protested, it was not proven that his legitimate interests take precedence, nevertheless the Applicant is Requested did not limit data processing;

- Article 21, paragraph 1: Despite the multiple, express objections of the Applicant, the Respondent continues to process your personal data, has not abandoned its intention to include them in the Publication discloses, without compelling legitimate reasons, which take precedence over the interests, rights and freedoms of the Applicant.

The applicant submitted the following requests for the Authority's decision:

- CL of 2016 on the general public administrative order. law (hereinafter:

based on § 106 of the Civil Code, take a temporary measure so that the Publication is not published in January 2022;

- 

in the absence of a temporary measure, Art. with immediate enforceability based on § 84

permanently ban the data controller Article 58 (2) of the General Data Protection Regulation

on the basis of paragraph f) of the Applicant's personal data

from its treatment in the Publication;

- it is imposed on the basis of Article 58 (2) point b) of the General Data Protection Regulation

without legal basis

el Requested as defined in paragraph 1 of Article 6

due to data management;

- it is imposed on the basis of Article 58 (2) point b) of the General Data Protection Regulation

the Applicant, as it was not covered by the Applicant's general data protection regulation

the exercise of the right of access contained in Article 15;

- based on point c) of Article 58 (2) of the General Data Protection Regulation, instruct a

You are requested to comply with Article 21 (1) of the Applicant

your request to exercise your right to protest;

- definitively based on Article 58 (2) point f) of the General Data Protection Regulation

prohibit the Applicant from publishing the Applicant's personal data in the Publication

from treatment.

### I.3. Requested statement

The Authority NAIH-1047-4/2022 dated January 31, 2022. notified in order no

He requested a request to initiate the procedure, as well as information on the circumstances of data management.

The applicant made a statement in his letter dated February 28, 2022 at the request of the Authority.

With regard to the purpose and legal basis of data management, he submitted that the "Publication in recent years received press coverage, according to the Data Controller's professional point of view, it is the most harmful and the most presents irritating cases of corruption in the form of case reports." Applicant's personal data

The purpose of data management, which includes the publication of the Publication, so Applicant is in the public interest

carrying out its activities, as well as exercising its right to express an opinion.

The legal basis for data management is primarily Article 6 (1) of the General Data Protection Regulation marked point e). In this round, he submitted that the Applicant operates as a non-profit foundation, which aims, among other things, to map corruption problems, inform the public, checking and facilitating the fulfillment of transparency expectations with special regard

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for the use of public funds. The publication serves this purpose, thus it implements an activity of public interest yes. In support of all this, he attached the Founding Deed of the Applicant and referred to its 2.1.

2.2. and 2.3. to the provisions of point

Article 6 of the General Data Protection Regulation has been designated as the legal basis for data management (1) point f) and Article 10 of the ECHR. According to the Respondent's point of view, 2021 for the Applicant.

individual attached to the statement sent to the Authority on December 6

interest assessment "exhaustively describes and at the same time supports how the data management served asserting the Data Controller's legitimate interests." The Requested is to avoid unnecessary repetitions

briefly explained the arguments included in the consideration of interests: Article IX of the Basic Law

based on paragraphs (1) and (2) of Art

and Hungary recognizes and protects the freedom and diversity of the press, ensures the

the conditions for free information necessary for the development of a democratic public opinion; the EJEE 10.

according to Article 1, everyone has the right to freedom of expression, which right in itself

it includes the freedom of opinion formation and the knowledge and communication of information and ideas

freedom to national borders

regardless of and without the involvement of an authority

to intervene. The practice of the Hungarian Constitutional Court and the ECtHR is democratic

recognizes the right to express an opinion as a fundamental right of countries, since without it the

neither social control nor informed choice is possible. Infotv. Section 5 (1)

on the basis of paragraph a), personal data can be processed, among other things, if it is required by law

ordered in the public interest. According to the respondent's view, "there can be no reasonable doubt" that

IX of the Basic Law. (1) and the fundamental rights contained in Article 10 of the ECHR, and

enforcement of Constitutional Court decisions regarding the protection of these rights is such

it is considered a goal based on public interest, for the realization of which personal is allowed

data management.

During the evaluation of his interests, the applicant also established that the expression of opinion

freedom, examination of the transparency of the spending of public funds, possible abuses and

disclosure of corruption cases and public information are, on the one hand, public money

on the spending, on the other hand, on the activities of the Respondent, such legitimate interests that establish it

against the protection of the Applicant's personal data.

All of the Applicant's personal data managed by the Respondent have already been made public

is based on currently available newspaper articles (listed in point I.1).

The necessity of data management is proved by the publication of the Applicant's personal data

without it, the purpose of expressing an opinion and providing information would fail, since the Requested a

could not support his conclusions regarding corruption suspicions. Data management

its proportionality is justified by the public nature of the cases described in the Publication, given that a

spending of public funds, the share thereof is associated with an increased obligation of tolerance, furthermore,

since all of the handled personal data has already been made public through the press, the data management

cannot cause disproportionate harm to the Applicant.

Regarding the Publication, the Applicant submitted that it was prepared in Hungarian and English,

it is not commercially available, it is distributed during professional events, furthermore

available on his website.

In terms of data management, he explained that he followed his data management regulations

first, carried out an interest assessment, provided the Applicant with information about data management, and then

Following the applicant's protest, he also carried out an individual interest assessment, in addition to the statutory one beyond its obligations, it also separately informed about the scope of personal data handled.

Applicant

in connection with his protest, he submitted that the one sent to the Applicant was unique

in the consideration of interests, the arguments were explained in sufficient detail, taking into account

did not comply with the protest. In this context, the general data protection regulation (65) highlighted

preamble, according to which the further retention of personal data is legal

can be considered if it is the exercise of the right to freedom of expression and information,

compliance with a legal obligation, or the execution of a task carried out in the public interest

or it is necessary due to the exercise of the public authority granted to the data controller.

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In his statement, the Respondent sent the scope of the Applicant's personal data under his control,

as well as URL links to the source of personal data.

The respondent also referred to Kúria Pfv.20.849/2020/4. judgment no., which is the justification

According to his point of view, it follows from paragraph [21] that the Applicant is from public funds

it is considered a public figure to the extent of its share. Requested exclusively from Requester public funds

in connection with his participation, it is handled personally by the Applicant for the purpose of information about it

his data, who as a public figure is burdened with an increased obligation of tolerance.

The Respondent attached the following documents to his statement:

- Requested Certificate of Incorporation;
- parts of the Publication containing the Applicant's personal data;
- Information sent to the applicant dated November 26, 2021 and the person who sent it

Cover letter;

– the Applicant's protest dated December 2, 2021, the accompanying letter sending it and

Authorization of the applicant's legal representative;

– the individual sent by the Respondent to the Applicant, dated December 6, 2021

consideration of interests and its accompanying letter;

– The applicant's reply dated December 13, 2021 and its accompanying letter;

– Requested response letter dated December 20, 2021 and its accompanying letter;

– Applicant's letter dated December 29, 2021;

- Requested letter dated January 7, 2022;

– Applicant's letter dated January 17, 2022;

- Requested letter dated January 21, 2022.

#### I.4. Other statements

The Authority NAIH-1047-7/2022. the Applicant was invited to make a statement in order no

in terms of what the allegations regarding the truthfulness of the sources indicated by the Applicant

it is based on and whether it initiated any proceedings due to the untrue statements published in the articles.

In his response, the applicant informed the Authority that, in his opinion, it is data protection

point of view, the disadvantageous situation does not primarily lie in the fact that the Publication is based on articles that

some of whose statements are untrue or misrepresent real facts, or something like that

contain information that is relevant or topical from the point of view of the Applicant

no, they do not have news value either, but are only tabloid-level and gossipy

information is discussed. The disadvantageous situation in terms of data protection is caused by the fact that

The requested information contained in the articles is new, much more harmful to the Applicant

put it in context. By publishing the Publication, the Respondent asserts that it is the Applicant

participated in the most serious corruption cases of recent years, which he bases on articles from which

none of them claim or even suggest the context according to the title of the Publication.

The applicant stated that against the articles on which the Publication is based

however, this does not mean that a press location adjustment lawsuit or other procedure has not been initiated

that the statements contained therein would be true. With the Applicant based on the published articles no official proceedings have been initiated against them, or if they have been initiated, they are crimes was found to be absent. In view of this, its inclusion in the Applicant Publication is serious and causes irreversible damage to his reputation and honor, with which the Respondent is serious committed data protection violations.

#### I.5. Exercising the right to inspect documents

The Authority NAIH-1047-10/2022. and NAIH-1047-11/2022. informed in orders no Applicant and Respondent that the evidentiary procedure was concluded, and also called them that a evidence based on the rules of document inspection, they can learn something about additional evidence they can make motions.

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##### I.5.1. Petitioner's motion

The applicant submitted a motion for proof on June 1, 2022. According to the applicant's point of view The respondent wrongly refers to the performance of an activity of public interest, since the publication of the Publication does not carry out any public interest activities. To prove the public interest, the Applicant referred to in its own charter, or arising from its operation as a non-profit foundation public interest to implement the activity. According to the applicant, the Publication its publication as a reference to an activity of public interest cannot be accepted as a legal basis, since legal basis according to Article 6 (1) point e) of the General Data Protection Regulation must establish, and the data management must be necessary for some public interest for the execution of a task performed in the context of the exercise of a public authority, which is present does not exist in this case. In this context, the applicant referred to the Authority NAIH/202/838/2, as well as NAIH/2020/1154/9. to its decisions no. in which the Authority stated that "Article 6 (1) of the GDPR legal basis according to paragraph e) for a public task classified as such by some legislation may be linked to related data management activities." The publication of the Publication is not a public task,

therefore, the Respondent cannot be considered a person performing a public function under the Civil Code. Section 459, paragraph (1), point 12

not based on either. The Publication is not related to a specific event, there is no "watchdog" type fact-finding and investigative work, since press reports that mainly state untrue and real facts and tried using other hearsay level information to seriously mislead the Applicant and put at a disadvantage. The respondent did not even try to give a thorough and factual picture

From the sources used, it is not possible to come to the conclusion that he is the Applicant would have participated in "the most irritating and most harmful corruption cases of past years".

The applicant also submitted, based on the letters sent to him, it can be stated with sufficient certainty, that an interest assessment was not carried out in advance, before the start of data management.

Requested letter dated December 6, 2021, in which he sent the consideration of interests, 10 days later than the Applicant's letter dated November 26, 2021, in which

informed the Applicant that his personal data for the purpose of publication in the Publication

is treated. In the letter dated December 6, 2021, the designation "individual interest consideration" is mentioned, which raises additional concerns, given that NAIH/2020/838/2. decision no

unequivocally states that the consideration of individual interests is the second after the protest

consideration of interests. As a result, based on the information provided, only the

to a conclusion

find out that the Requested did not complete the data processing before

consideration of interests, and a so-called

"unique" consideration of interests, which, due to what was presented later, does not correspond to the individual requirements for consideration of interests. The applicant's concerns regarding data management

The applicant did not deny the data protection official procedure before or after it, or

proved the opposite.

His "individual" interest assessment carried out after a requested protest is also inappropriate. The Authority

NAIH/2020/838/2. decision no. states that the data controller specifically has the right to protest



the individual needs to be carried out on a case-by-case basis, taking into account the circumstances presented in the application

consideration of interests, which circumstances the Applicant did not meet. Applicant is December 2021

In his letter dated the 2nd, he explained in detail that the data processing is in the absence of an appropriate legal basis is illegal, and publication in the Publication would cause harm to the Applicant's interests.

The applicant's "unique" consideration of interests is not reflected by the applicant in any way

to what has been said, he does not even mention them, he only repeats them in a slightly larger scope in 2021.

contained in the letter dated November 26. The "unique" consideration of interests, but still Requested

He also ignored his notification to the authority dated February 28, 2022, and neither

mentioned the interests of the Applicant as a stakeholder, he did not consider the consequences

for publication in the Publication. The

furthermore

also contains contradictions, as it was sent by the Respondent on December 6, 2021

Based on the "individual" consideration of interests on page 2, the purpose of data management is: "The data controller ensures that the

What is the impact of the covid19 pandemic on tourism in Hungary, and what is the Hungarian state like

took measures to protect the tourism sector, which has been severely affected by the covid19 epidemic

and who are the recipients of these measures." This letter from the applicant shows that it is

In the balance of interests test, the purpose of data management was incorrectly indicated, as it is another

"remained in" from the document.

In point 2 of its information dated February 28, 2022, requested the Authority

within the scope of interest consideration, he repeatedly referred to the fact that: "Managed by the Applicant Data Controller

"unique" consideration of interests

may

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all of your personal data has already been made public and is still available

based on newspaper articles'. In this round, the Applicant wanted to reiterate that the ECtHR had also pointed it out that the mere fact that some information is accessible to the public is not necessarily exclude it from the protection of Article 8 of the European Convention on Human Rights. And that both the ECHR and the CJEU stated that the right to respect for private life, and in order to balance the right to freedom of expression the correctness of the published information is of particular importance.

In view of the above, the Applicant requested from the Authority the fact of illegal data processing determination, and the possible imposition of a fine at the discretion of the Authority.

#### I.5.2. Requested motion

The applicant submitted a statement on May 26, 2022, following the inspection of the documents, in which he presented his position regarding the provisions marked as violated by the Applicant.

The Respondent in points a) and b) of Article 5 (1) of the General Data Protection Regulation with regard to the requirements of specific transparency and purposefulness, he submitted that on a single occasion, due to a text creation error, you incorrectly marked the context of data management, but about this mistake, as he informed the Applicant about the true purpose and context of the data management. The applicant is aware of the purpose and context of data management, and confirms that it is the context of data management forms the basis of the indicated violation.

According to the Applicant, the Respondent violated Article 5 of the General Data Protection Regulation (1) point c) of the principle of data saving by the fact that in the Publication a contains the Applicant's irrelevant data from the point of view of the specific data management purpose.

At the same time, according to the respondent's opinion, data processing is strictly defined and lawful from the point of view of purpose, it is limited to the minimally necessary extent, the Applicant is personal your data.

According to the Applicant, by the fact that the Applicant used in the Publication from unreliable sources and includes inaccurate personal data, violated Article 5 (1) of the General Data Protection Regulation the principle of accuracy defined in paragraph d) Requested to the Applicant more

indicated on several occasions that he was not aware of the personal data handled in the Publication

with respect to any source on which it is based, a legal proceeding has been initiated or would have been ongoing, which is the given one

would cast doubt on the authenticity of the statement contained in the source. The applicant does not make such a claim in the present proceedings either

deed. The subjective relationship to the reliability of the requesting sources is not the subject of the procedure.

The applicant is the accountability provided for in Article 5 (2) of the General Data Protection Regulation

he indicated his principle in view of the fact that the Respondent could not prove that he was the aggrieved party

would have an appropriate legal basis for data management. According to the respondent, however, it is

informed about the legal basis of data management on several occasions, supported by detailed reasons

Applicant, from which information it became clear to the Applicant beyond doubt that it is

why the legal basis for data processing is appropriate.

According to the applicant's point of view, Article 6 (1) e) and f) of the General Data Protection Regulation

indirect reference to the legal grounds specified in point also constitutes a violation of law, since

with regard to point e), he does not have the right to do so, and he has not completed it with regard to point f).

away from the consideration of interests. According to the applicant, the reality, on the other hand, is that it is general

carried out the interest assessment in accordance with the data protection decree, and then supplemented it individually

it was supported by the preparation of an interest assessment and the presentation of exhaustive arguments

legal basis for data management and informed the Applicant accordingly.

According to the respondent's opinion, in paragraphs (1)-(2) of Article 12 of the General Data Protection Regulation

fulfilled its stated obligations, in good faith and diligently when informing the Applicant

acted with care, the Applicant, in addition to the legal requirements, also about the content of the processed data

informed him. The applicant was able to exercise the right to protest without hindrance and is entitled to access

nor is his right violated due to the content information. The applicant was fully aware of the

with the exact content of his personal data, because the Respondent informed the sources of the data processing,

about newspaper articles available to anyone. For the applicant, the Publication could not have caused the

surprise with regard to personal data handled, as they match the data relating to the Applicant, with publicly available personal data.

Applicant in accordance with points c) and e) of Article 14 (1) and 15 of the General Data Protection Regulation.

(1) regarding the recipients of data processing and the categories of recipients

with imprecise definition, as well as failure to specify the purpose of data management

he justified. According to the applicant, in the information provided to the applicant several times a

In accordance with the nature of the publication, sabbatical to the extent permitted by its nature

indicated the recipients of the data management. According to the Respondent's point of view, the Applicant is obvious

is aware of the recipients of the data management, i.e. that the Publication is generally intended for citizens,

since the essence of his request is that his person is linked to corruption in public.

As part of the violation of Article 15 (3) of the General Data Protection Regulation, the Respondent submitted,

that he provided substantive information about the personal data, or due to knowledge of the sources of the data

The Applicant was aware of which specific personal data the Applicant had

in treatment.

According to the applicant He applied for Article 17 (1) point c) of the General Data Protection Regulation

violated him by not terminating the data processing despite his protest. Requested

according to, at the same time, he duly certified the legality of the data management towards the Applicant, thus it is

no obligation to terminate data processing.

Within the scope of Article 18 (1) point d) of the General Data Protection Regulation, the Respondent submitted,

that in addition to the appropriate verification of the legal basis for data processing, the interest related to data processing

his priority was confirmed, which the Applicant was aware of, so he did not violate the provision referred to.

According to the applicant's point of view, in Article 21 (1) of the General Data Protection Regulation

provisions were violated by the Applicant, despite his repeated and express protests and

continued to process your personal data even in the absence of a compelling legitimate reason. As requested, it is

data management is carried out in order to implement the requested public benefit goals.

The Respondent considered it important to highlight that the Applicant does not manage his personal data, rather, he complains that it was linked to corruption in the Publication. The resulting can claim damage caused by damage to reputation and reputational risks, but not the You have the option within the authority's official data protection procedure. Applicant during the procedure and before that, he indicated several times that his personal data was in a context of corruption is aggrieved by the increase, but there is no possibility to remedy this grievance by the Authority within the framework of the procedure. In view of the above, the Respondent considers the procedure to be terminated justified.

## II. Applicable legal provisions

VI of the Basic Law. based on Article (3), everyone has the right to the protection of their personal data, and to learn and disseminate data of public interest.

XXIV of the Basic Law. based on Article (1), everyone has the right to have their affairs a authorities without bias, in a fair manner and within a reasonable deadline. The authorities as defined by law, they are obliged to justify their decisions.

Based on Article 2 (1) of the General Data Protection Regulation, the General Data Protection Regulation must be used to manage personal data in whole or in part in an automated manner, as well as for non-automated processing of personal data that are part of a registration system or which become part of a registration system they want to do.

For data processing covered by the General Data Protection Regulation, Infotv. Paragraph (2) of § 2 according to the General Data Protection Regulation as defined in the provisions indicated there must be applied with supplements.

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According to Article 4, point 1 of the General Data Protection Regulation, "personal data": you are identified any information relating to an identifiable natural person ("data subject"); it is possible to identify the a a natural person who, directly or indirectly, in particular an identifier, for example

name, number, location data, online identifier or physical, physiological,  
one or more factors related to your genetic, intellectual, economic, cultural, social identity  
can be identified based on

Based on Article 4, point 2 of the General Data Protection Regulation, "data management": on personal data  
or any operation performed on data files in an automated or non-automated manner or  
set of operations, such as collection, recording, organization, segmentation, storage, transformation or  
change, query, insight, use, communication, transmission, distribution or otherwise  
by way of making it available, coordination or connection, restriction, deletion,  
or destruction.

Pursuant to Article 4, point 7 of the General Data Protection Regulation, "data controller": the natural or legal one  
person, public authority, agency or any other body that is the personal data  
determines the goals and means of its management independently or together with others; if the data management  
its purposes and means are determined by EU or Member State law, the data controller or the data controller  
EU or member state law can also determine special aspects for its designation.

Based on Article 5 (1) of the General Data Protection Regulation, personal data:

a) must be handled legally and fairly, as well as in a transparent manner for the data subject  
conduct ("legality, due process and transparency");

b) should be collected only for specific, clear and legal purposes, and should not be processed  
in a manner inconsistent with these purposes; in accordance with Article 89 (1) no  
is considered incompatible with the original purpose for the purpose of archiving in the public interest, scientific  
and further data processing for historical research purposes or statistical purposes ("target binding");

c) they must be appropriate and relevant for the purposes of data management, and a  
they must be limited to what is necessary ("data sparing");

d) they must be accurate and, if necessary, up-to-date; all reasonable measures must be taken  
to do in order to ensure that inaccurate personal data from the point of view of the purposes of data management  
be deleted or corrected immediately ("accuracy");

e) must be stored in such a way that the identification of the data subjects is only personal enables the processing of data for the time necessary to achieve its goals; personal data here may be stored for a longer period only if the personal data in accordance with Article 89 (1) for the purpose of archiving in the public interest, scientific and will take place for historical research purposes or for statistical purposes, the persons concerned in this regulation appropriate technical and organizational measures required to protect your rights and freedoms subject to the implementation of measures ("limited storability");

f) must be handled in such a way that appropriate technical or organizational measures the appropriate security of personal data should be ensured with its application, the data is unauthorized or by unlawful handling, accidental loss, destruction or damage including protection against ("integrity and confidentiality").

Based on Article 5 (2) of the General Data Protection Regulation, the data controller is responsible for (1) for compliance with paragraph and must also be able to demonstrate this compliance ("accountability").

Management of personal data based on Article 6 (1) of the General Data Protection Regulation it is only legal if and to the extent that at least one of the following is fulfilled:

- a) the data subject has given his consent to the processing of his personal data for one or more specific purposes for its treatment;
- b) data management is necessary for the performance of a contract in which the data subject is one of the parties, or to take steps at the request of the data subject prior to the conclusion of the contract required;
- c) data management is necessary to fulfill the legal obligation of the data controller;
- d) the data processing is for the vital interests of the data subject or another natural person necessary for its protection;
- e) the data management is in the public interest or for the exercise of public authority delegated to the data controller necessary for the execution of the task carried out in the context of;

f) data management to enforce the legitimate interests of the data controller or a third party necessary, unless the interests of the data subject take precedence over these interests or fundamental rights and freedoms that require the protection of personal data, especially if a child is involved.

Point f) of the first subparagraph cannot be applied by public authorities in the performance of their duties for data management.

Based on Article 12 (1) of the General Data Protection Regulation, the data controller is compliant takes measures in order to allow the data subject to process personal data

all relevant information referred to in Articles 13 and 14 and Articles 15-22 and according to Article 34

all information in a concise, transparent, understandable and easily accessible form, clearly

and provide any information addressed to children in a comprehensible manner

case. The information in writing or in another way - including, where applicable, the electronic way

must also be specified. Verbal information can also be given at the request of the data subject, provided that it is done in another way

the identity of the person concerned was verified.

Based on Article 12 (2) of the General Data Protection Regulation, the data controller facilitates the data subject 15-22. the exercise of his rights according to art. In the cases referred to in Article 11 (2), it is

data manager is the person concerned 15-22. the fulfillment of his request to exercise his rights according to Art can refuse, unless it proves that the data subject cannot be identified.

Based on Article 14 (1) of the General Data Protection Regulation, if the personal data is not obtained from the data subject, the data controller will make the following available to the data subject information:

- a) the identity and contact details of the data controller and - if any - the representative of the data controller;
- b) contact details of the data protection officer, if any;
- c) the purpose of the planned processing of personal data and the legal basis of data processing;



d) categories of personal data concerned;

e) recipients of personal data, or categories of recipients, if any;

f) where appropriate, the fact that the data controller is a recipient from a third country

wishes to forward personal data to an international organization, and a

The existence or absence of a Commission conformity decision, or in Article 46, Article 47

or in the case of data transmission referred to in the second subparagraph of Article 49 (1) a

to indicate appropriate and suitable guarantees and to obtain copies thereof

reference to the means or their availability.

Based on Article 14 (2) of the General Data Protection Regulation referred to in paragraph (1).

in addition to information, the data controller makes it available to the data subject for the data subject

the following additional information necessary to ensure fair and transparent data management:

a) the period of storage of personal data, or if this is not possible, this period

aspects of its definition;

b) if the data management is based on point f) of paragraph (1) of Article 6, the data controller or a third party

about your legitimate interests;

c) the data subject's right to request the personal data relating to him from the data controller

access, their correction, deletion or restriction of processing, and may object to

against the processing of personal data, as well as the data subject's right to data portability;

d) based on point a) of Article 6 (1) or point a) of Article 9 (2)

in the case of data management, the right to withdraw consent at any time, which is not

affects the legality of data processing carried out on the basis of consent before withdrawal;

e) the right to submit a complaint addressed to a supervisory authority;

f) the source of the personal data and, where applicable, whether the data is publicly available

whether they come from sources; and

g) the fact of automated decision-making referred to in paragraphs (1) and (4) of Article 22, including

also profiling, as well as, at least in these cases, the applied logic and that

understandable information about the significance of such data management and what it is like for the data subject has expected consequences.

Based on Article 15 (1) of the General Data Protection Regulation, the data subject is entitled to receive feedback from the data controller regarding the handling of your personal data

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is ongoing, and if such data management is ongoing, you are entitled to have your personal data and get access to the following information:

- a) the purposes of data management;
- b) categories of personal data concerned;
- c) recipients or categories of recipients with whom or with which the personal data communicated or will be communicated, including in particular to recipients in third countries, or international organizations;
- d) where appropriate, the planned period of storage of personal data, or if this is not possible, criteria for determining this period;
- e) the data subject's right to request personal data relating to him from the data controller rectification, deletion or restriction of processing and may object to such personal data against treatment;
- f) the right to submit a complaint addressed to a supervisory authority;
- g) if the data were not collected from the data subject, all available information about their source;
- h) the fact of automated decision-making referred to in paragraphs (1) and (4) of Article 22, including also profiling, as well as, at least in these cases, the applied logic and that understandable information about the significance of such data management and what it is like for the data subject has expected consequences.

Based on Article 16 of the General Data Protection Regulation, the data subject is entitled to, upon request, data controller to correct inaccurate personal data relating to him without undue delay.

Taking into account the purpose of data management, the data subject is entitled to request incomplete personal data

addition of data - among other things, by means of a supplementary declaration.

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

upon request, the data controller shall delete the personal data relating to him without undue delay,

and the data controller is obliged to provide the personal data concerning the data subject without justification

delete it without delay if any of the following reasons apply:

a) the personal data are no longer needed for the purpose for which they were collected or otherwise

treated in a manner;

b) the data subject withdraws it pursuant to point a) of Article 6 (1) or point a) of Article 9 (2)

point, the consent that forms the basis of the data management, and the data management has nothing else

its legal basis;

c) the data subject objects to data processing based on Article 21 (1) and \* has no priority

enjoying a legitimate reason for data processing, or the data subject objects on the basis of Article 21 (2)

against data management;

d) personal data were handled unlawfully;

e) the personal data is legal as prescribed by EU or member state law applicable to the data controller

must be deleted to fulfill an obligation;

f) to collect personal data with the information society referred to in paragraph 1 of Article 8

took place in connection with the offering of related services.

Based on Article 18 (1) of the General Data Protection Regulation, the data subject is entitled to

at your request, the data controller limits data processing if one of the following is met:

a) the data subject disputes the accuracy of the personal data, in this case the limitation is for that period of time

applies, which allows the controller to check the accuracy of personal data;

b) the data processing is illegal and the data subject opposes the deletion of the data and requests them instead

limitation of its use;

c) the data controller no longer needs the personal data for the purpose of data management, but the data subject does

requires them to present, enforce or defend legal claims; obsession

d) the data subject has objected to data processing in accordance with Article 21 (1); in this case the limitation it applies to the period until it is established that the data controller has legitimate reasons whether they take precedence over the legitimate reasons of the data subject.

Based on Article 21 (1) of the General Data Protection Regulation, the data subject is entitled to a object to your personal data at any time for reasons related to your own situation in accordance with Article 6 (1) against treatment based on points e) or f), including the aforementioned provisions based profiling as well. In this case, the data controller may not process the personal data further, unless the data controller proves that the data processing is such compelling legitimate reasons justified, which take precedence over the interests, rights and freedoms of the data subject

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for its protection according to the regulation against, or for the presentation, enforcement or defense of legal claims are connected.

Pursuant to Article 77 (1) of the General Data Protection Regulation, other administrative or without prejudice to judicial remedies, all interested parties are entitled to file a complaint with a supervisory authority - in particular your usual place of residence, place of work or presumed in the Member State where the infringement took place - if, according to the judgment of the data subject, the relevant personal processing of data violates this regulation.

On the basis of Article 85 (1) of the General Data Protection Regulation, the Member States in legislation match the personal data e right to

with the right to freedom of expression and information, including personal data also its handling for journalistic purposes or for the purpose of scientific, artistic or literary expression.

Based on Article 85 (2) of the General Data Protection Regulation, personal data are journalistic purpose, or for the purpose of scientific, artistic or literary expression

Member States define exceptions or deviations in II. chapter (principles), III. chapter (i.e

affected rights), IV. chapter (the data controller and data processor), chapter V (personal data transmission to third countries or international organizations), VI. chapter (independent supervisory authorities), VII. chapter (cooperation and uniformity) and IX. chapter (i.e special cases of data management) if these exceptions or deviations are necessary to a the right to the protection of personal data can be negotiated with the expression of opinion freedom and the right to information.

Infotv. The right to the protection of personal data pursuant to Section 60 (1) and (2).

in order to enforce it, the Authority is a data protection authority at the request of the data subject initiates a procedure and may initiate a data protection official procedure ex officio. The official data protection procedure request to initiate the General Data Protection Regulation in Article 77 (1), as well as a It can be submitted in the case specified in point b) of § 22.

Infotv. According to § 61, paragraph (1), point a), it was made in the official data protection procedure in its decision, the Authority issued Infotv. with the data management operations specified in paragraph (2) of § 2 in the context of general data protection according to paragraph (2).

may apply legal consequences. Accordingly, acting within the Authority's corrective powers:

Article 58 of the Decree

- a) warns the data manager or the data processor that some draft data management its activities are likely to violate the provisions of this regulation;
- b) condemns the data manager or the data processor if its data management activities violated the provisions of this regulation;
- c) instructs the data manager or the data processor to comply with this regulation for the data subject your request to exercise your rights under;
- d) instructs the data manager or the data processor that its data management operations - given in a specified manner and within a specified period of time - harmonises this regulation with its provisions;

e) instructs the data controller to inform the data subject about the data protection incident;

f) temporarily or permanently restricts data management,  
including data management  
also its prohibition;

g) in accordance with the provisions of Articles 16, 17 and 18, orders personal data  
rectification or deletion, or limitation of data management, as well as Article 17 (2)  
and in accordance with Article 19, orders the notification of those recipients,  
with whom or to which the personal data was disclosed;

h) revokes the certificate or instructs the certification body to comply with Articles 42 and 43  
to withdraw a duly issued certificate or instruct the certification body to  
do not issue the certificate if the conditions for certification are not or are no longer met;

i) imposes an administrative fine in accordance with Article 83, depending on the circumstances of the given case  
depending, in addition to or instead of the measures mentioned in this paragraph; and

j) orders the flow of data to a recipient in a third country or an international organization  
suspension.

In the absence of a different provision of the General Data Protection Regulation, data protection initiated upon request  
for official procedure, the Acr. provisions shall be applied with the deviations specified in Infotv.

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the

Based on

especially

public authority

activity

legislative,

Infotv. 75/A. §, the Authority in paragraphs (2)-(6) of Article 83 of the General Data Protection Regulation  
exercises its powers taking into account the principle of proportionality, in particular by a

relating to the processing of personal data - in legislation or the European Union is mandatory

in the event of the first violation of the regulations specified in the act, the violation

in accordance with Article 58 of the General Data Protection Regulation - primarily that

takes action with the warning of a data controller or data processor.

The Akr. Pursuant to § 17, the authority has its authority and competence in all stages of the procedure

investigates ex officio. If you notice the absence of one of them and it can be established beyond doubt in the case

competent authority, the case will be transferred, failing which the application will be rejected

or terminate the procedure.

CXXVII of 2017 on general sales tax. Act (hereinafter: VAT Act) Section 7 (2)

paragraph

the

judicial, prosecutorial, defense, law enforcement, foreign affairs and judicial administration,

administrative law enforcers, official control and financial control, legality

supervision and control, public finance, European Union and other international support

decision-making activity on its distribution.

Act C of 2012 on the Criminal Code (hereinafter: Penal Code) Section 459 (1)

Pursuant to point 12, a person performing a public function:

a) a soldier of the Hungarian Armed Forces on duty,

b) a person assigned to the civil defense organization and performing civil defense service,

c) the civil guard in the Act on the Civil Guard and the Rules of Civil Guard Activity

during the performance of its specific activities,

d) a member of a church person and a religious association professionally performing a religious ceremony,

e) in court or other official proceedings, the defender, the legal representative, the expert, and the official

delivery executor who is not a person,

f) the healthcare worker in the legal relationship with the healthcare provider

another person and the patient rights representative defined in the Act on Health Care

in cases,

g) a member of the state rescue service, as well as another organization entitled to rescue, with the rescue and in connection with patient transport,

h) a member of the municipal and facility fire department, as well as the volunteer fire brigade association a during the performance of its firefighting and technical rescue duties,

i) in the case specified in the Act on National Public Education, the teacher and the educator and an employee who directly supports teaching work, defined in the Act on Vocational Training case, the instructor, and in the case specified in the Act on National Higher Education, the lecturer, teacher and scientific researcher of a higher education institution,

j) in the Act on the Protection of Children and Guardianship Administration, as well as the social employed in a position specified in the Act on Administration and Social Benefits person during the exercise of this activity,

k) forestry personnel and members of authorized forestry personnel about the forest, the forest within the scope of its activities defined in the law on forest protection and management,

l) the professional hunter on game protection, game management and hunting within the scope of its activities defined by law,

m) the activity of the fish guard as defined in the Act on Fish Management and Fish Protection

In the circle of,

n) performing executive duties at the economic organization operating a public transport vehicle person in the course of this activity,

o) this activity of the person performing customer relations tasks at the universal postal service provider during

p) the school guard within the scope of his activities defined in the Act on the Police,

q) the armed security guard during the performance of his duties,

r) on national and local public roads, owned by the state or local government

on private roads not closed to public traffic, as well as in squares, parks and other public areas



public parking service aimed at ensuring waiting for the road

road

about transport

According to the law, the parking spaces at the service organization are suitable for their intended purpose

by vehicle

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the person performing the operation and monitoring the proper use of the parking spaces e

during its activities,

s) the road inspector and operator inspector are defined in the Act on Road Traffic

within its activities.

About the right of association, non-profit legal status, and the operation of civil organizations and

CLXXV of 2011 on support Act (hereinafter: Civil Code) based on § 2. point 20

public benefit activity is any activity that is a public task specified in the founding document

serves its fulfillment directly or indirectly, thereby contributing to society and the individual

to meet your needs.

The Civiltv. Pursuant to Section 34, Paragraph (1), Point a), the organization is required to register as a public utility

its founding document must contain what kind of public benefit activity(ies) the organization carries out,

which public task(s) it carries out in relation to this public benefit activity(ies), and that e

which legal place(s) prescribe(s) the performance of public tasks, as well as - if with membership

has - it does not exclude that other than its members can also benefit from its public benefit services.

CIV of 2010 on freedom of the press and the basic rules of media content. law (a

hereinafter: Smtv.) based on paragraph (2) of § 15, the media content service provider is obliged to the public

made a statement for the purpose of communication by the person giving the statement or included in the media content

to show it to a person - at their request - prior to publication; it cannot be disclosed if a

the data subject does not consent to publication because the media content service provider does so on its merits

altered or distorted by the person making the statement or in the media content

harmful to him. It was done despite the withdrawal of consent, for reputation or honor

in case of harmful communication, the relevant civil law and criminal law rules must be applied.

### III. Decision of the Authority

The Authority is responsible for the protection of personal data and for the public interest and public interest

checking and promoting the enforcement of the right to access public data. THE

Authority is the two informational rights, i.e. informational self-determination and informational freedom, as

is intended to monitor and promote the enforcement of the fundamental right to communication, in view of which it is present

case, he had to act with special caution when considering competing fundamental rights.

It is also important to state that the Authority has the context of data management, i.e

expression of opinion, its possible defamatory or slanderous nature

authority to investigate, thus deciding whether it is a violation of the Applicant's personal rights

does not belong to his competence in any way.

The Authority considers it important in this context, both in relation to the present case and in general

state that the data protection supervisory authorities will not and cannot act a

in cases under the jurisdiction of civil courts, thus the right to the protection of personal data

opinions that are offensive to the affected parties and (perceived) illegal from a civil law point of view cannot become either

as a means of limitation. To this

in view of the untruthfulness of the Applicant Authority,

did not and could not investigate his allegations of defamation.

In accordance with the above, the Authority to the Publication published by the Applicant during the procedure

related to the personal data of the Applicant (Chapter [...] of the publication "[...]", Chapter [...] "[...]" )

examined the legal basis of data management, the rights of the data subjects, as well as the

enforcement of the principles regarding the management of personal data.

#### III.1. Legal basis for data management

Requested in the information sent to the Applicant, as well as in the statement made to the Authority

states that the legal basis for data management is primarily Article 6 of the General Data Protection Regulation

(1) point e), secondarily Article 6 (1) f) of the General Data Protection Regulation

point.

A prerequisite for the legality of processing personal data is that the data controller is suitable to indicate the legal basis; however, with regard to a specific data management purpose, only one legal basis can be determined. According to the Authority's position, the data controller is the same

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with regard to the purpose of data management, it indicates several legal bases, it violates the principle of transparency, among other reasons,

because the legal basis of data processing affects which right the data subject has and in what form

can practice. Accordingly, the practice of having one data controller is not acceptable

assign multiple legal bases for data processing, as it is non-transparent data processing for the data subject results, thereby narrowing the enforcement of the right to self-determination of information.

#### III.1.1. Performing tasks in the public interest and exercising public authority

The requested legal basis for data management is primarily Article 6 of the General Data Protection Regulation (1) point e) was defined. Accordingly, data management is legal if it is in the public interest or in the context of the exercise of a public authority granted to the data controller necessary to perform the task.

A task of public interest can be defined by EU or Hungarian legislation, in the wording of the decree "public interest task" listed in Hungarian law corresponds to the "public task" used in Hungarian law. Although there is no specific public duty, defined in law, in general

it can be said that the term is to be interpreted broadly, in that various public and a wide range of municipal activities must be understood.

In relation to the exercise of public authority, it also applies that the legal basis for data management is EU must be determined by member state law. An overlap can be established between public authority and the performance of public duties

and, considering that in the case of the former, the legislator entrusted the data controller with a public task, which is associated with the exercise of public authority. For example, it can be taken into account as a definition of public authority

the VAT Paragraph (2) of § 7, on the basis of which public authority activity, in particular the statutory creative, judicial, prosecutorial, defense, law enforcement, foreign and judicial administrative, law enforcers of public administration, official control and financial control, a legality supervision and control, public finance, European Union and other international decision-making activity on the distribution of support.

In this context, the respondent referred to the fact that it operates as a public benefit foundation, the purpose of which is among other things, mapping corruption problems, informing the public and that monitoring and facilitating the fulfillment of transparency expectations, with particular regard to for public funds. Since the Publication serves this purpose, it implements an activity of public interest. The former in support of Articles 2.1., 2.2., 2.3. of the Founding Deed. marked his points.

Several activities of public benefit are listed in the Applicant's Certificate of Incorporation, which a for anti-corruption activities and for the preparation of related communication materials, as they are related to a public task, respectively

in general, public benefit organizations do not perform a public task, but for a public task they carry out related public benefit activities. The Civiltv. based on the interpretative provisions of public benefit activity is directly the fulfillment of the public task specified in the founding document indirectly serving activity. The Civiltv. Section 34, paragraph (1), point a) also states that a the establishment document of a public benefit organization contains the type of public benefit activity it carries out and e performs its public benefit activity in connection with a public task. Based on this, it can be determined that although the public benefit activity is closely related to a public task and its serves its realization, the two concepts do not mean the same thing.

In view of the above, the Authority concludes that the Publication does not serve the Applicant

public duty related to its publication, so the legal basis for data management cannot be the general one

Article 6 (1) point e) of the Data Protection Regulation.

### III.1.2. Legitimate interest

therefore, according to the Authority's point of view, the Applicant,

Secondarily, Article 6 of the General Data Protection Regulation is requested as the legal basis for data management

determined a legitimate interest according to point f) of paragraph (1). The legal basis of the legitimate interest

for its application, the data controller must perform an interest assessment test, during which it is

the data controller proves that his legitimate interest in data management precedes and takes priority

against the interests, fundamental rights and freedoms of the data subject.

The balance of interests test is a multi-step process. First of all, the data controller needs it

determine for what purpose and with reference to which legitimate interests it plans personal data

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handle. In this context, the data controller has the defined goal(s) and the data to be managed

you must justify your interest in data management precisely and in detail. E is right

in terms of interest, the following three conjunctive conditions must be met: the legitimate interest

it must be legal; the legitimate interest must be clear (i.e. it cannot be accepted

general, abstractly formulated interest); as well as the legitimate interest as real,

must be current.

As a next step, the data controller must check that it is specified and legal

with regard to the purpose of data management, is it necessary to process personal data, or is the purpose feasible?

e even without processing personal data. The data controller must present the circumstances

which justify the data processing for him, and also what advantages it brings, positive

consequences, and what the lack of implementation of data management would limit.

In order to prove the necessity, an additional aspect is for the data controller to demonstrate that the specified

why the goal cannot be achieved without processing personal data.

As a third step, the data controller must assess the interests and

rights can be identified. The data controller must evaluate the information disclosed during the assessment of interests aspects, explain why data management is necessary in terms of the data management purpose and the extent to which the limitation of rights and expectations identified on the side of the stakeholders is proportionate.

Relevant

aspect, which personal data is covered by the data management, what is the source of the personal data, data management

duration, the favorable or unfavorable impact on the affected parties

data processing to his private sphere, and whether the data processing is limited by the data subject should also be evaluated exercise of rights. During the assessment of interests, the data controller must also address what it is incorporates guarantees into the data management, which ensure the data subjects' self-determination enforcement of his right.

The requested purpose of the data management is the publication of the Publication and thus the Requested public interest determined the performance of its activities and the exercise of its right to express an opinion

yes; and freedom of expression as a legitimate interest of data controllers, public funds

examination of the transparency of its spending, possible abuses and cases of corruption

publicizing and informing the public about the spending of public funds and the Applicant

about his activity. According to the Authority's point of view, the interests identified by the Applicant are adequate

to the conjunctive conditions referred to above against the legitimate interest. The marked

data controller interests are compatible with EU and Hungarian legal provisions,

and also meet the requirement of clarity, since the Respondent is sufficiently specific

determined that for the publication of the Publication, thus for the related data management

what interests you. The requested interests are also real and existing, since they are direct

are related to the public benefit activities of the Applicant as a public benefit foundation.

The respondent also adequately substantiated the need for the processing of personal data, as

expressing an opinion or providing information as a data management purpose would fail the treated personal

without providing data and the relevant part of the Publication would become unintelligible.

The Respondent justified the proportionality of the data management by stating that in the Publication to the Applicant cases described are public cases, increased tolerance for participation from public funds is associated with an obligation, and all of the processed personal data has already been previously published by the press has been made public, so data management cannot cause disproportionate harm.

Although the Respondent took into account the Applicant's circumstances, their assessment and interests during his comparison, he acted superficially, he did not do everything to ensure that it was with data management, especially with the public

Consequences The applicant is unique

he examines it in relation to his life situation. Thus, it can be established without a doubt that the Applicant is the applicant did not necessarily act with the expected care when identifying interests, but at the same time the case

in view of all the above circumstances, as well as the purpose of data management, according to the Authority's point of view regarding the consideration of interests

infringement

the level of ascertainability. In this round, the Authority took into account the fact that

Requested - on the basis of what was explained above - as a non-profit organization in the interest of the public is engaged in activities and has endeavored to cooperate with the Applicant throughout.

uncovered deficiencies were not achieved

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In view of the above, the Authority accepts the Respondent's consideration of interests and states that it is

The legal basis for data management is the legitimate interest of the data controller, so the request is based on the General Data Protection Regulation

It is rejected in relation to the finding of a violation of point f) of Article 6, paragraph (1).

### III.1.3. Legality of the legal basis

Since the Respondent has indicated two legal bases in parallel as the legal basis for data management, this is it created an uncertain legal situation for the person concerned and violated the general data protection regulation

The principle of transparency defined in point a) of Article 5 paragraph (1).

The Authority will review the part of the application that is in accordance with Article 6 (1) e) of the General Data Protection Regulation

is aimed at establishing a violation, it is rejected, given that it is the legal basis for data management transparency has been established in view of the legitimate interest of the data controller and the parallel legal bases breach of principle.

### III.2. Stakeholder rights

Several letters were exchanged between the Applicant and the Respondent prior to the data protection authority procedure occurred, which are several, the General Data Protection Regulation III. stakeholder right defined in chapter are also affected. The Authority is the stakeholder rights indicated by the Applicant below examined its validity.

#### III.2.1. Regarding transparent information, communication and the exercise of the rights of the data subject provisions

Article 12 (1) of the General Data Protection Regulation defines the type of data controller communication with the data subject and requests for exercising the data subject's rights are burdened with obligations regarding. This article is primarily intended to enforce the principle of transparency for data controllers by formulating specific requirements for communication.

After examining the correspondence between the Respondent and the Applicant, the Authority established that The Respondent communicated with the Applicant in a structured, transparent structure and in a form that is understandable to the public. THE

The information provided to the applicant was concise and clearly worded letters, met the content requirements, mostly reflected by the Applicant for performances. The applicant always responded to the applicant's letters within one month in accordance with Article 12 (3) of the Data Protection Regulation.

Although the Applicant, in his letter dated December 6, 2021, really stated the different data management marked a goal ("The data controller is investigating the impact of the covid19 pandemic on for tourism in Hungary, and what measures the Hungarian state has taken in response to the covid19 epidemic



in order to protect the tourism sector, which is particularly affected by recipients"), thereby providing self-contradictory information in this regard, the error is the later clarified during correspondence, so this alone does not establish transparent information violation of its requirement.

Data subject rights defined in Article 12 (2) of the General Data Protection Regulation no violation of the requirement to facilitate its exercise can be established either. Applicant its exercise of rights was not hindered by any circumstances arising in the interests of the Respondent. Responded to the Applicant's letters and requests for the exercise of the rights of the affected person on the merits, within the deadline reacted. The second sentence of the linked paragraph is not in the context of the examined data management relevant.

In view of the above, the Authority concludes that the Respondent has not violated the general paragraphs (1)-(2) of Article 12 of the Data Protection Regulation, rejects the relevant part of the request.

### III.2.2. Information to the person concerned

Guidelines of the Article 29 Working Party on Transparency (hereinafter: WP260) 26. based on point 14 of the General Data Protection Regulation, among other things, in that case applies if the data controller obtains the personal data from a publicly available source. To this with regard to the Data Management in relation to the Publication in respect of the Requested in Article 14 had to provide specific information to the Applicant.

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According to the applicant, the data management was not clearly defined by the applicant its legal basis, as well as the range of recipients. Although the fact that he applied for the publication is two indicated a legal basis, it is really illegal, it does not in itself establish the relevant law illegality of information as well. It requested the legal bases of the data management defined by it provided clear information in accordance with the General Data Protection Regulation: in several letters, explained in detail which legal basis it considers to be applicable and for what reason

in relation to data management.

The requirements for the content of the information specified in the annex of WP260 as such state that the actual recipients of the personal data or the categories of the recipients are required to give. In accordance with the principle of fair procedure and transparency, the data controllers have the information most relevant to the person concerned needs to be made available regarding the recipients forgive them. In practice, this should primarily be precisely named recipients, at the same time, if the data controller specifies the categories of recipients, it is possible it must be the most concrete, the most limited. At the same time, the position of the Authority is if the purpose of data management is the exercise of freedom of expression and public opinion information, the requirements for the specific definition of recipients are not are enforceable. It is not expected that the data controller is on the Internet without restrictions with regard to the information made available, it is precisely determined that the information published is personal which circle will have access to data. If the law enforcer expects this from the data controllers, that is freedom of expression and freedom of the press due to its impossibility would represent a disproportionate limitation. The Authority therefore considers it acceptable that it is the Applicant he named the Hungarian society and the international public as the recipients of data management yes.

In view of the above, the Authority concludes that the Respondent has not violated the general points c) and e) of Article 14 (1) of the Data Protection Regulation, the relevant part of the application rejects.

### III.2.3. Right of access

The data subject's right to access is one of those ensuring the enforcement of the right to informational self-determination most important stakeholder right. It ensures the transparency of data management for the data subject that be fully aware of what your personal data is and how it is handled.

As the Authority already stated in III.2.2. stated under point, Requested for the purpose of data management and

already fulfills its obligation to provide information regarding the categories of recipients in the first letter deed. The Respondent made the relevant information available to the Applicant, so it is Article 15 (1) points a) and e) of the General Data Protection Regulation cannot be established yes.

According to the applicant's point of view, he did not send it to him despite his repeated requests

The verbatim text planned to be published in the Publication about the Applicant violated the general Article 15 (3) of the Data Protection Regulation.

Based on the referenced provision, the data controller is responsible for the processed personal data includes making a copy available to the person concerned, accordingly the right of access

within the framework of its exercise, it cannot be requested that the data controller is the article or communication planned to be published

send it in its entirety to the person concerned.

Although the Respondent is not a press organization, the Authority considers it important to refer to Smtv. Section 15 (2) paragraph, on the basis of which the obligation of the press only extends to the fact that the public communication made a statement for the purpose of the statement to the person giving the statement or appearing in the media content - at its request - it must be shown before publication. The General Data Protection Regulation

The interpretation of the right of access provided by the above, by the Applicant, is thus generally a would represent an unreasonable limitation of press freedom and freedom of expression, since it is it would provide those concerned with access to all articles and communications before publication and for publication that contains their personal data.

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In view of the above, the Authority concludes that the Respondent has not violated the general points a) and e) and paragraph (3) of Article 15 (1) of the Data Protection Regulation, the request for this rejects the relevant part.

#### III.2.4. Right to protest, deletion and restriction of data processing

Article 21 of the General Data Protection Regulation provides the data subject with the right that Article 6 (1)

object to data processing based on points e) or f) of paragraph 1, with your own situation

for a related reason. In this case, the data controller may no longer process the personal data,

unless a so-called by carrying out a unique interest assessment, it proves that the data management is as such

justified by compelling legitimate reasons that take precedence over the interests and rights of the data subject

and freedoms.

The individual interest assessment is a second interest assessment following the protest of the data subject, in which

the data controller reflects on the circumstances based on his own situation presented in the protest of the data subject.

Accordingly, the condition for exercising the right to protest is that the data subject is sufficient

explain in detail the reasons for your personal objection arising from your personal situation

against the processing of your data. The prerequisite for the latter is the individual consideration of interests by the data

controller

feasibility.

The applicant based his objection on the fact that certain statements of the sources on which the publication is based

they are untrue or falsely present real facts, and in many cases only

they discuss rumor-level information, which the Applicant places in a new context, and also from them

draws wrong conclusions. The Applicant further objected that the Respondent nominated two legal grounds

and with regard to the named legal grounds, he presented which, according to his opinion, for what reason

does not apply in relation to the data processing of the Respondent.

In his letter dated December 6, 2021, the applicant sent his unique assessment of interests,

which, according to the Authority's point of view, should actually be carried out in connection with the legal basis of the

legitimate interest,

it was an extended consideration of interests. However, the Authority accepts the latter individually

consideration of interests, given that the Applicant did not provide such a reason in his protest, no

presented the circumstances on the basis of which the Applicant had performed previously

individualize consideration of interests

although he referred to it in his protest

to the falsity of certain statements in the sources on which data management is based, however he did not support it with anything.

Based on the wording of the General Data Protection Regulation, the data subject's objection has one of its own it must be based on reasons related to your situation. However, the respondent did not give any in his protest present a reason specifically related to his own situation, an individual circumstance that the Applicant would have been relevant from the point of view of the balance of interests, and for which thus He could have carried out a unique assessment of interests on the requested merits. Respondent in his protest as an individual circumstance, only the – in his opinion – harmful context of data management can be evaluated, but this is not from a data protection legal point of view, at most from a civil law point of view with significance.

In view of the above, the Authority concludes that the Respondent has not violated the general Article 21 (1) of the Data Protection Regulation, thus Article 17 (1) of the General Data Protection Regulation does not reject point c) of the paragraph, nor the relevant part of the application.

At the same time, the Authority finds ex officio that the Applicant did not comply with the general requirements of the obligation contained in Article 21 (4) of the Data Protection Regulation, on the basis of which the clearly inform the data controller about the right to protest and everything else must be displayed separately from information. The Respondent, on the other hand, sent it to the Applicant in his first notification, he lists the rights of the affected person to protest in one sentence with the other rights of the affected person

his right and only touched on the fact that the person concerned has the right to protest in this context did not provide any additional information regarding the exercise of the right of the data subject.

Based on Article 18 (1) point d) of the General Data Protection Regulation, the data controller is limited the data management in case of objection by the data subject, until it is established that the data controller whether his reasons take precedence over the legitimate reasons of the data subject. Given that the The publication was not published until the individual interest assessment was sent, the Applicant was not would have known. Applicant

violated this provision of the general data protection regulation, so the request is to the Authority rejects the relevant part.

### III.3. Basic principles

The applicant claims that transparency, purpose limitation, data saving, marked by principles of accuracy and accountability.

The Authority noted the violation of the principle of transparency above, in III.1.3. with regard to that established under point to the fact that the Applicant indicated several legal grounds.

The requested party clearly and unambiguously stated the purpose of the data management: the Publication publication,

therefore, the related personal data management is the expression of opinion

for the exercise of his freedom and his public benefit activities, i.e. corruption problems

necessary for its mapping and related information. According to the authority's point of view, a

The data management purpose chosen by the respondent is clear, legal, and clearly communicated towards those concerned. Due to the delimitation of the topic of the expression of opinion and the purpose of the communication, a

a specific data management purpose does not allow inventory data collection. In view of the former, no a violation of the principle of purposefulness can be established.

The applicant did not violate the principle of data saving either. Based on the principle of data saving a personal data can be processed to the extent and for the time necessary to achieve the goal, and they must be appropriate and relevant. The Authority is the expression of opinion as

depending on the purpose of data management, no data management exceeding the principle of data economy has been established

and the scope of the handled data was closely related to the discussed topic.

The Applicant has repeatedly referred to the fact that the personal data managed by the Respondent they come from an unreliable source, their accuracy is not substantiated. The principle of accuracy

ensures that the processed personal data is timely, up-to-date and relevant. These also circumstances that cannot be requested in relation to an opinion. With this in relation to the Metropolitan Court of Justice 104.K.701.309/2021/15. stated in his judgment no. that "a in relation to the management of personal data, Article 5 (1) of the General Data Protection Regulation

The requirement of accuracy prescribed in point d) cannot be interpreted in the case of opinions, precisely because because an opinion expressed about a natural person is not that natural person person's personal data. In Article 4, paragraph (1), point 1 of the General Data Protection Regulation

The formulated definition of »personal data« is necessarily general in nature, however any information about an identified or identifiable natural person is not it can correspond to an opinion about an identifiable natural person, or it is untrue statement of fact. Regardless of the value judgment of outsiders, it is considered personal data, it is natural to examine the legality of the processing of any information concerning a person by the defendant has authority, whereas an opinion or factual statement about a natural person only the civil court is authorized to determine its possible illegality."

The principle of accuracy also imposes obligations on the data controller and the data subject creates: although the data controller is primarily responsible for the accuracy of the data, in many cases it is cannot be fulfilled without the cooperation of stakeholders. At the same time, neither the Respondent nor the In the direction of the authorities, he did not support what he based his claims in this regard on. Authorities in this regard, he made a separate statement to the Applicant, who, however, did not submit even when called upon by the Authority

evidence of how the content of the articles used as sources does not match the with reality. Furthermore, the applicant's entitlement as a stakeholder is that Article 16 of the General Data Protection Regulation.

correct inaccurate personal data concerning him, which affects his right - of despite the fact that he tried to enforce several other stakeholder rights - he did not exercise them.

According to the Authority's point of view, the Respondent was able to adequately prove the data protection

compliance with requirements: compliant with the provisions of the General Data Protection Regulation provided information, the Applicant's position regarding the legality of data management, as well as in the direction of the Authority, presented with adequate support, with data management was a related banner.

In view of the above, the Authority concludes that the Respondent did not violate the general purpose limitation according to point b) of Article 5 (1) of the data protection decree, point c)

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data economy, accuracy according to point d) and the General Data Protection Regulation (2) the principles of accountability according to paragraph 1, therefore rejects the relevant part of the application.

#### III.4. Other questions

Article 85 of the General Data Protection Regulation obliges the legislator of the Member States to, on the one hand, the personal

to reconcile data protection and the right to freedom of expression,

on the other hand, it provides the possibility that the data processing for the purpose specified there standards allowing deviations from the provisions of the general data protection regulation

create. Given that the domestic legislature has not enacted legislation in this area,

it is indifferent which persons or organizations fall under the scope of this article.

#### III.5. Legal consequences

The Authority condemns it on the basis of Article 58 (2) point b) of the General Data Protection Regulation

Requested in accordance with Article 5 (1) point a) of the general data protection regulation and the general due to violation of Article 21 (4) of the Data Protection Regulation.

The Authority, due to the established violations of Article 58 (2) of the General Data Protection Regulation

d) instructs the Requested Party to harmonize its data management operations

with the provisions of the General Data Protection Regulation: base your data processing on a legal basis, which when choosing, act carefully, taking into account the relevant standards and jurisprudence,

and information about the data subject's right to object in the general data protection regulation



in accordance with its regulations, expressly, clearly and separately from all other information

yes.

In his submission, the applicant asked the Authority that the Ákr. temporary based on § 106 measures to prevent the Publication from being published [...]. The Authority is the personal data subject scope of data, as well as in view of the fact that they are previously disclosed personal data data, did not consider it justified that the final decision in the data protection official procedure order a temporary measure before taking it.

In the absence of a temporary measure, the applicant asked the Authority that the Ákr. With regard to § 84 Ban the applicant with immediate enforceability Article 58 (2) of the General Data Protection Regulation from the processing of the Applicant's personal data based on paragraph f). The position of the Authority according to him, there are no circumstances that would justify the immediate enforceability of his decision, in view of the fact that the personal data affected by the examined data management were previously all have been made public, therefore the objectionable data management operation – i.e. the personal data Publication in a publication - from a data protection point of view, it is not based on immediate ordering enforceability.

In his request for the Authority's decision, the applicant also indicated that the Authority on the basis of point c) of Article 58 (2) of the General Data Protection Regulation, instruct the Applicant, to comply with the right to object under Article 21(1) on the basis of your request, or on the basis of point f) of Article 58 (2) of the General Data Protection Regulation definitively by from its publication.

The Authority specifically informed the Applicant that any personal has any procedure been initiated in relation to the article that is the source of the data, who answers in the negative given This circumstance was important in determining the legal consequences, because leads to the conclusion that the Applicant does not manage his personal data per se, but

their contextualization by the Requested person, so not the data management, but the related infringes related expression of opinion.

Data management purposes indicated by the respondent, i.e. the exercise of the right to express an opinion, as well as promoting the Respondent's public interest activities, including the transparency of public funds goals that deserve special consideration and are partially in the public interest, which justify that a

Taking into account the principle of gradation in the corrective powers of the authority. THE

Requested to the Applicant in the Applicant section of the publication

granted by the state

about subsidies, public procurements, i.e. public money, as well as one of the largest Hungarian online

ban Request for Applicant's personal data in Publication

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writes about the change in the ownership structure of the news portal. These are public matters in respect of which the informing the public is a value that must be protected from the point of view of freedom of information.

The ECHR reached a conclusion similar to the Authority's position when 37374/05. no

stated in his judgment:

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"The Court must conduct its investigation with the utmost care when a

measures taken by national authorities – including measures which

they merely make access to information more difficult – they are apt to

discourage the press, one of the "watchdogs" of society, from

participate in a public debate on matters legitimately considered to be of public interest."

"Taking into account the interest protected by Article 10, the law cannot allow such an arbitrary act

restrictions that can become a form of indirect censorship if the authorities

they put obstacles in the way of gathering information. It is the latter activity

for example, it is a fundamental preparatory step in journalism, and freedom of the press is inherent, constitutes a protected part".

"However, the realization of this function is not limited to the media or professional journalists. THE in this case, the preparation of the public discussion forum was carried out by a non-governmental organization. It can therefore be established that the purpose of the applicant's activity is public was a fundamental element of the debate. The Court has repeatedly recognized civil society his important contribution to the discussion of public affairs."

"It can therefore be established that he is informed about the purpose of the applicant's activities was a fundamental element of public debate. The Court has repeatedly recognized the civil society's important contribution to the discussion of public affairs (see e.g. Steel and Morris v. the United Kingdom (no. 68416/01, § 89, ECHR 2005-II). The applicant for various purposes – including the protection of freedom of information - litigating human rights issues association. Therefore, like the press, social "watchdog"

can be considered (cf. Riolo v. Italy, no. 42211/07, § 63, 17 July 2008; Vides Aizsardzības Klubs v. Latvia, no. 57829/00, § 42, 27 May 2004). In these circumstances, the Court was convinced that the association's activities are at a level similar to that provided to the press It justifies treaty protection."

In view of the above, the Authority did not consider it justified that based on the established violations of rights ex officio order the deletion of personal data, impose a data protection fine, or fine grant the Applicant's request that the Authority permanently ban the Applicant a from handling personal data. III.2.4. and based on what was explained in point, those a circumstances on the basis of which the Authority could order the Applicant to protest to fulfill your request to exercise your right.

ARC. Procedural rules

During the procedure, the Authority exceeded the relevant administrative deadline, therefore the Ákr. Section 51 (1) shall pay ten thousand forints to the Applicant based on point b) of paragraph

The competence of the Authority is set by Infotv. Article 38, Paragraphs (2) and (2a) defines it, the jurisdiction of the country covers its entire territory.

The Authority issues this decision in addition to the Applicant to the Respondent as the complained data controller also sends it to

\* \* \*

This decision is based on Art. 80-81. § and Infotv. It is based on paragraph (1) of § 61. The decision is in Art.

Pursuant to § 82, paragraph (1), they become final upon their publication. The Akr. Section 112 and Section 114 (1) based on paragraph 1, the decision may be appealed through an administrative lawsuit.

The rules of the administrative trial are set out in Act I of 2017 on the Administrative Procedure hereinafter: Kp.) is defined. The Kp. Based on § 12, paragraph (1), by decision of the Authority

the administrative lawsuit against falls within the jurisdiction of the court, the lawsuit is referred to in the Kp. § 13, subsection (3) a)

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Based on point aa), the Capital City Court is exclusively competent. The Kp. Section 27, paragraph (1).

On the basis of point b), legal representation is mandatory in a lawsuit within the jurisdiction of the court. The Kp. Section 39 (6)

according to paragraph of the submission of the claim for the administrative act to take effect does not have a deferral effect.

The Kp. Paragraph (1) of Section 29 and, in view of this, CXXX of 2016 on the Code of Civil Procedure. law (hereinafter: Pp.) applicable according to § 604, electronic administration and trust

CCXXII of 2015 on the general rules of services Act (hereinafter: E-

administrative tax.) According to point b) of § 9, paragraph (1), the client's legal representative is electronic obliged to maintain contact.

The time and place of filing a claim against the Authority's decision is set by Kp. Section 39 (1)

paragraph Information about the possibility of a request to hold a hearing can be found in Kp.

It is based on paragraphs (1)-(2) of § 77. The amount of the administrative lawsuit fee is determined by the 1990 Law on Fees. year XCIII. Act (hereinafter: Itv.) 45/A. Section (1) defines. The fee is in advance from the payment of the Itv. Paragraph (1) of Section 59 and point h) of Paragraph (1) of Section 62 exempt the procedure initiating party.

Budapest, according to electronic signature

Dr. Attila Péterfalvi

president

c. professor