

Registration number: NAIH/1433-1/2023

History: NAIH/4678/2022

Subject: approving the request

decision

DECISION

The National Data Protection and Freedom of Information Authority (hereinafter: Authority) (...) (...,
hereinafter: Applicant) was initiated against (... , hereinafter: Applicant) at the request of (...), hereinafter: Applicant).
the Applicant in a data protection official procedure
grants your request
and makes the following decisions.

1. The Authority condemns the Applicant for having offended natural persons
on the protection of personal data in terms of processing and that such data is free
(EU) 2016/679 on the flow and repeal of Directive 95/46/EC
regulation (hereinafter: "GDPR" or "general data protection regulation")

1.1. Article 15 (3) by not fulfilling the Applicant's access request;

1.2. Paragraph (1) of Article 12 and Paragraphs (1)-(2) of Article 13 with the fact that the Applicant
did not provide adequate data management information;

1.3. Paragraph 2 of Article 12 is affected by the fact that it was not facilitated by the Applicant
exercise of rights;

1.4. Article 5 (1) points a) and b) with the fact that the data management practices of the examined
was not transparent and its data management purposes were not defined and
they are clear!

2. The Authority instructs the Applicant that Article 15 (3) GDPR of the Applicant
complete your access request according to

3. The Authority instructs the Applicant that the services provided to the Applicant
in relation to Article 12 (1) of the GDPR and Article 13 (1)-(2) of the GDPR

prepare and make your data management information available according to

4. The Authority instructs the Applicant that, among the services provided to the Applicant

ensure and

promote the exercise of the rights of the affected parties!

5. The Authority instructs the Applicant to fully inform the Applicant of the

about ongoing data processing of your personal data; prohibits the Applicant from

The applicant's personal data is provided for the purpose of the applicant's "professional activity".

use,

with initiated official procedures

their use in context!

not including against him

6. The Authority rejects the part of the application concerning the imposition of a data protection fine,

at the same time the Petitioner ex officio

HUF 1,000,000, i.e. one million forints

data protection fine

obliged to pay.

.....

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I. The data protection fine according to point 6 above at the initiation of the judicial review

the expiry of the applicable deadline for filing a claim, or in the event of a review being initiated a

collection of centralized revenues by the Authority within 15 days of the court's decision

target settlement

HUF account (10032000-01040425-00000000 Centralized direct debit

account IBAN: HU83 1003 2000 0104 0425 0000 0000) must be paid. The amount

upon transfer, NAIH/1433/2023 BÍRS. number must be referred to.

If the Respondent does not fulfill his obligation to pay the fine within the deadline, the above

must pay a late fee to the account number. The amount of the late fee is the legal one

interest, which is the central bank interest valid on the first day of the calendar semester affected by the delay

equal to the base interest rate.

In the event of non-payment of the fine and late fee, the Authority shall issue a decision

implementation.

II. 2-3 above. and 5. to the Respondent in this decision

must be in writing within 30 days of its notification - the supporting evidence is copies

along with its presentation and presentation of its measures - to certify to the Authority, as above

referring to the registration number.

2-3 above. and 5. in case of non-fulfilment of the obligations, the Authority shall order a

implementation of the decision.

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

within 30 days from the date of issue, with a letter of claim addressed to the Capital Tribunal

can be challenged in a lawsuit. The claim must be submitted to the Authority electronically¹, which

forwards it to the court together with the case documents. The request for the holding of the trial is submitted by the

must be indicated in the application. For those who do not receive full personal tax exemption

the fee for the administrative lawsuit is HUF 30,000, the lawsuit is subject to the right to record the fee. The capital city

Legal representation is mandatory in court proceedings.

JUSTIFICATION

I. Clarification of the facts

(1) I.1. The Applicant to the Authority on 27.09.2021. in his application received on he is suffering from a serious cancer and related to his health complaints previously used some of the Respondent's services.

(2) Based on the application, in April 2021, the Applicant requested the registered and the release of all health data and personal data diagnosed by him By request. According to the Applicant, the Respondent asked the Applicant he did not release some of his personal data citing data security reasons, only that made his personal data available to the Applicant, which the Applicant obtained from the Applicant in the first place. According to his claim, through his legal representative a The Applicant contacted the Respondent repeatedly, but this attempt was also unsuccessful remained, the Requested did not send the requested data.

1 The NAIH_K01 form is used to initiate the administrative lawsuit: NAIH_K01 form (16.09.2019)

The form can be filled out using the general form filling program (ÁNYK program).

The form is available from the following link: <https://www.naih.hu/kozig-hatarozat-birosagi-felulvizsgalata>

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(3) I.2. In this regard, the Applicant submitted to the Authority with the Application in the subject correspondence. This includes an e-mail exchange between the Applicant and Between the applicant, in which 28.04.2021. on April 2020, the Applicant requested the Between September 2020, "Materials with the applicant" by e-mail or by post sending. In response to this, the Respondent requested clarification on the same day, what materials the Applicant has in mind. According to the Applicant's answer to this, requests the release of materials that the Respondent kept on him during this period, of course in terms of health, and indicated that the complete documentation claim. The Applicant 04.05.2021. in his daily answer, he stated that it is certain can transfer "materials", however "materials recorded by them", "data security reasons" you cannot send it. This email contained 6 attachments.

(4) The Applicant attached

also such that a

partially related to his substantive complaint

also exchanges of letters, which are the legal representative of the Applicant and the legal representative of the Respondent

took place between From this it can be established that the Applicant through his legal representative

a 2021.05.28. he also indicated in his daily letter that in connection with his illness and treatment

according to his point of view, the Respondent unjustifiably denied the release of the resulting documents

yes.

(5) The Applicant attached XI. by the District Office

also sent the letter in which the Applicant was notified of his complaint

about the result of his investigation. In the latter document, the Applicant was informed that a

The applicant does not have an operating license entitling him to provide health services

therefore, an official procedure will be initiated against the Application.

(6) In relation to the data management information, the Applicant indicated that its content

did not recognize him.

(7) I.3. The Applicant asked the Authority to oblige the Applicant

to fulfill your access request. The Respondent issues a copy to the Applicant

copy of all the Applicant's personal data in the Applicant's management, here

including, in particular, health data and findings, even with the Service of the Requested Party,

they arose in connection with his diagnosis, whether they were produced by someone else.

In connection with this, the Applicant submitted that the Respondent for his diagnosis

used three different machine tools and for each of these tests

also requests the full release of his personal data (the results of the tests).

(8) The Applicant also asked the Authority to reprimand the Applicant for the

access request 05.04.2021. has not fulfilled it since 2016, depending on the gravity of the case

consider the possibility of imposing a fine and oblige the Applicant to a

its related data management practices will be brought into line with the current one for the future with legislation.

(9)

I.4. The Authority with the Requester's request to initiate official data protection proceedings

in order to clarify the facts, he sent the Respondent the

NAIH/4678-2/2022. order with file number. In addition, the Authority has provided some evidence to the

NAIH/4678-3/2022. recorded in a memo with case file number.

The Applicant to the referenced order NAIH/4678-4/2022 and NAIH/4678-5/2022

He provided the following information in his answers with file number:

(10) The Applicant has file number NAIH/4678-4/2022, 05.04.2022. received his reply on

based on the Respondent's handling of the Applicant's personal data for accounting purposes

in this context, it manages the data of the Applicant's name and address. Data management is carried out by (...)

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invoicing program, the legal basis for data processing for this purpose is legal

marked the fulfillment of an obligation.

(11) In connection with its services, the Respondent submitted that various software,

during the use of devices, the Applicant manages various personal data: the (...)

software (hereinafter: "D" software) the Applicant's name, date of birth and

German; in the (...) software (hereinafter: "N" software) your name, date of birth,

your gender and address; and in the (...) instrument (hereinafter: "S" instrument) name and date

manages data. These programs and instruments were completed by the Applicant

for activities (naturopathic complementary activity, improving physical well-being

service) is used. The Contract is the legal basis for this data management

marked its completion.

(12) The Respondent also submitted that the Applicant's data at the beginning of the legal relationship,

18.03.2010 on a document called "Data Sheet". On this

in the context of data management, the Applicant's name, date of birth, address, telephone number, manages your email address and nationality. The purpose and legal basis of this data management is a

The applicant did not indicate it in his answer. The Requested to the Authority is the Data Sheet he did not submit a copy.

(13) The Respondent in relation to the data management in question, the retention period uniformly defined "the existence of the legal relationship underlying the service referring to his time.

(14) In its response, the Respondent stated that it sent the Applicant by e-mail and the documents submitted to the Authority in duplicate.

(15) According to his claim, the Respondent did not release it to the Applicant at the request sent by e-mail the "D" software "created graphic material" because of these personal encounters on each occasion, the Applicant received it.

(16) According to the Respondent, no "paper documentation" is created in the "N" software. since it is a "graphical program".

(17) According to the Respondent, the instrument "S" is only "documentation created by". contains a list. The Respondent did not send this to the Applicant either, why in his opinion, this is an internal working copy containing no personal data. With this in connection, the Respondent further explained that the Applicant's request here he could not interpret the relevant part, it was not clear to him what it meant is directed to, and since his attempt to contact the Applicant by telephone was unsuccessful remained, there was no way to clarify this.

(18) According to the Respondent, among the documents submitted to the Authority submitted the "Applicant Internal Documentation" from instrument "S", a However, no such attachment could be identified for the authorities.

(19) In his answer, the Respondent also stated that, in his opinion, the data after entering it into the program, the documentation produced with the above programs

they do not contain personal data.

(20) As part of its response, the Respondent submitted the 28.04.2021. effective on its data management information, which it claims is available on its website (link) and in addition

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submitted that the Data Sheet filled out at the beginning of the legal relationship also contains, according to his claim, the information on data management.

The Respondent also submitted a number of health related to the Applicant documents that may or may not have been produced or issued by the Applicant the device used to produce them could not be determined from the document.

(21) The Respondent also submitted that the letter sent to the Applicant on 04.05.2021. daily the phrase "data security reason" in his answer was wrong, the real obstacle was that the Applicant could not clearly determine which one it was from his application is aimed at documents. And under "materials recorded by him" to the Applicant in the e-mail he sent, he meant the working copy of the "S" instrument, which had "the name and that contains the date of that day and does not contain any other personal data".

(22) According to the Respondent's point of view, the Applicant in initiating the present procedure is was motivated by the fact that he was dissatisfied with the service provided by the Applicant and submitted that a Because of this, the Applicant previously had a financial claim against the Respondent.

(23) The Applicant has file number NAIH/4678-5/2022, 12.05.2022. an additional one on the day also submitted an additional response to the Authority, as part of which additionally sent me some

additional health related to the Applicant documents that were partly not produced by the Applicant, partly not it can be determined by which device it was produced. The additionally submitted among the documents are not copies of the e-mail sent to the Requested Applicant were featured.

(24) I.5. The Respondent's reply and the related supplementary ones have been sent

documents, in order to clarify the facts, the Authority a

By order with file number NAIH/4678-6/2022, he asked the Respondent additional questions

up.

(25) The Respondent, in its response recorded in case file number NAIH/4678-7/2022, with the above

provided the Authority with the following information regarding:

(26) The Respondent submitted to the Authority in duplicate with the Applicant a

his correspondence on the subject.

(27) He did not provide a technical description of the "D" software, "N" software and "S" software he used

about instruments (hereafter together: "instruments"), but disclosed their manufacturers and again

stated which types of data in each instrument according to his opinion

manages.

To the Authority regarding the specific data management operations performed with the instruments

to the question asked, the Respondent submitted that the Applicant - given to the instrument

according to the related data type - your personal data into the indicated instruments

"leads", but does not perform any further data management operations with them. In addition, the

The respondent submitted that the instruments he used were the provided personal data

on the basis of which "comparative reports are also generated".

(28) In relation to the instruments used, the Applicant submitted to the Authority a

Managed data about the applicant, as well as the applicant's data sheet and a screen recording

from the Microsoft Access interface on which the Applicant is personal according to the Data Sheet

records your data.

According to the information requested from the Data Sheet, the subject document is stored by the Applicant for

in order to ensure the Applicant's identifiability through this, and in order to a

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can fulfill its contractual obligations, according to its position, it is

the legal basis for this data management is the fulfillment of the contract.

(29) According to the Respondent's answer, the processed personal data (data sheet, measurement results) from 2006 on paper in the on-site archive and from 2008

It is done in Microsoft Access. On the screen save taken from the Microsoft Access interface along with other personal data, the Applicant's telephone number, address and partial also your email address.

(30) In response to the Authority's question regarding custody time, the Respondent submitted that the custody time lasts until the affected parties request the deletion of the processed data, because the Requested through this, it ensures that the data stored in this way is subsequently released to those concerned can provide ("[the Applicant] keeps the data sheets and measurement results of its customers (...) until until a request for deletion is received from them. The main reason for this practice is that at the customer's request, the previously created ones can be issued even years later documents").

(31) I.6. Knowing the information provided about the manufacturers, the Authority recorded in a memo the Some of the instruments used by the applicant are available from public sources user guides, technical descriptions, information.

(32) According to the available information documents² about the "D" software, the software is further developed by the manufacturer

together with tools and instruments. The product that can be obtained in this way ("device set" or "delivery set"), based on the documents, it is suitable for the record patient data, modify this data, and export data or import. Based on the documents, the program is suitable for perform measurements on the patient, the results of which are recorded and stored by the program, it is also suitable for making comparisons on some test data, perform analyses. The software contains the examination results of the given patient (for example recording and viewing an ECG curve, spectral analysis, complex analysis, etc.)

According to the Hungarian-language document, these test results are "the patient's physiological provide detailed information on its status", the relevant part of the English-language document according to "These tabs display a detailed information on the patient's functional state".

Both documents include "long-term monitoring" and "Long-Term Observation" term, for which the software is suitable based on the information that a given patient also stores the examination results prepared with the software, thus ensuring that partial results can be compared in the longer term. THE according to the documents, it is possible to print the test results from the software or writing to a CD.

(33) According to the information available about the "N" software³, the software analyzes the data used by the program. The website also provides relevant information it is stated that sharing the test results with the patient technically solved: "Results are quickly available for review with your clients. You can also give them access to log in and see their results online, or you can send them a complete PDF report".⁴ Based on this, viewing the results with appropriate access either online, or even by sending a report in pdf format.

2 in Hungarian: [\(link\)](#); in English: [\(link\)](#)

3 [\(link\)](#)

4 "Results are quickly available for review with patients. You can even give them access, so they can log in and view their results online or you can send them a full PDF report."

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(34) According to the information sheet 5 available about the "S" instrument, measuring different loads with the instrument can be done. It is not clear where the test results will be published and the whether they can be recorded in the instrument or whether they can be imported from it. At the same time, the Applicant submitted to the Authority in duplicate the documents which according to his claim, he produced it about the Applicant using the device in question, so it is

documents are created, their storage is part of the data management processes of the Requested Party.

(35) I.7. The Authority referred the Applicant in order with file number NAIH/4678-9/2022 and

The applicant was also informed in the order of NAIH/4678-10/2022

about the completion of the evidence procedure and the possibility of exercising some of their rights.

(36) The referred orders are addressed on the basis of the relevant delivery certificates

were received, but no further declaration was made within the time limit specified in them

Neither the Applicant nor the Respondent did.

II. Applicable legal provisions

(37) On the right to informational self-determination for data management under the scope of the GDPR and

CXII of 2011 on freedom of information. Act (hereinafter: Infotv.) Section 2 (2)

according to paragraph of the general data protection

decree indicated there

shall be applied with the additions specified in the provisions.

(38) Infotv. The right to the protection of personal data based on paragraphs (1)-(2) of § 60

in order to enforce it, the Authority, at the request of the person concerned, data protection

initiates official proceedings and can initiate official data protection proceedings ex officio. The

the request to initiate a data protection official procedure is the general data protection

in Article 77 (1) of the Decree, as well as Infotv. defined in point b) of § 22

can be submitted in this case.

(39) Based on Article 77 (1) of the GDPR, other administrative or judicial

without prejudice to legal remedies, everyone concerned is entitled to file a complaint

with a supervisory authority - in particular your usual place of residence, workplace or

in the Member State where the alleged violation is located - if, according to the judgment of the person concerned, the

the processing of relevant personal data violates this regulation.

(40) In the absence of a different provision of the General Data Protection Regulation, the application was initiated

for official data protection procedure of 2016 on the general public administrative procedure

CL. Act (hereinafter: Act) shall be applied in Infotv

with certain deviations.

(41) The Art. According to Section 35 (1), the request is made in writing or in person by the customer submitted statement, with which the official procedure is conducted, or the authority requests its decision in order to assert its right or legitimate interest.

(42) The Art. Based on § 38, the application must be judged according to its content, even if it does not match with the name used by the customer.

(43) According to Article 4, point 1 of the GDPR, "personal data": identified or identifiable any information relating to a natural person ("data subject"); it is possible to identify the a a natural person who, directly or indirectly, in particular identifier such as name, number, location data, online identifier or a

5 (link)

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physical, physiological, genetic, intellectual, economic, cultural or natural person can be identified based on one or more factors related to his social identity.

(44) Based on Article 4, point 2 of the GDPR, "data management": you are on personal data any operation performed on data files in an automated or non-automated manner or a set of operations, such as collection, recording, organization, segmentation, storage, transformation or change, query, insight, use, transmission of information, by means of distribution or other means of making available, coordination or connection, restriction, deletion or destruction.

(45) Pursuant to Article 4, Clause 15 of the GDPR, "health data": a natural person's physical or personal data about your mental health, including natural also data relating to health services provided to a person, which carries information about the health status of the natural person.

(46) Based on Article 15 (3) of the GDPR, the data controller shall

provides a copy of personal data to the data subject. Requested by the data subject for additional copies, the data controller shall charge reasonable administrative costs may charge a fee of If the person concerned submitted the application electronically, it information should be available in a widely used electronic format to forgive, unless the person concerned requests otherwise.

(47) Based on paragraphs (1)-(2) of Article 13 of the GDPR:

d)

the)

b)

c)

(1) If personal data concerning the data subject is collected from the data subject, the data controller available to the data subject at the time of obtaining the personal data

releases all of the following information:

the identity of the data controller and - if any - the data controller's representative and your contact details;

the contact details of the data protection officer, if any;

the purpose of the planned management of personal data, as well as the data management its legal basis;

in the case of data management based on point f) of paragraph (1) of Article 6, the data controller or legitimate interests of third parties;

where appropriate, recipients of personal data and categories of recipients, if any such;

where applicable, the fact that you are in a third country where the data controller is located wishes to transfer personal data to an international organization, and the existence or absence of the Commission's conformity decision, or the 46.

Article, Article 47 or the second subparagraph of Article 49 (1).

in the case of said data transmission, indicating the appropriate and suitable guarantees,
as well as the means for obtaining a copy of them or those
contact information.

e)

f)

the)

(2) In addition to the information mentioned in paragraph (1), the data controller is the personal data
at the time of acquisition, in order to be fair and transparent
provide data management, the data subject about the following additional information
informs:

on the duration of storage of personal data, or if this is not possible, on
aspects of determining the duration;
about the data subject's right to request from the data controller the relevant
access to personal data, their correction, deletion or
restriction of processing and can object to the processing of such personal data,
as well as the data subject's right to data portability;

b)

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c)

d)

e)

f)

at the time

Article 6(1)(a) or Article 9(2)(a)

in the case of data management based on any

by

right of withdrawal, which does not affect the consent before the withdrawal

the legality of data processing carried out on the basis of;

on the right to submit a complaint to the supervisory authority;

about whether the provision of personal data is statutory or contractual

whether it is based on an obligation or a prerequisite for concluding a contract, and whether it is

whether the data subject is obliged to provide personal data, and how it is possible

failure to provide data may have consequences;

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

including profiling, as well as, at least in these cases, the employee

logic and comprehensible information regarding such data management

what significance it has and what expected consequences it has for the person concerned.

(48) Based on Article 12 (1) of the GDPR, the data controller shall take appropriate measures

in order to ensure that the processing of personal data for the data subject, a

All information mentioned 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,

provide it in a clear and comprehensible way, especially for children

for any information. Information given in writing or otherwise - including

in this case, the electronic route must also be entered. Verbal information at the request of the person concerned

can also be given, provided that the identity of the person concerned has been verified in another way.

(49) On the basis of Article 12 (2) of the GDPR, the data controller facilitates the relevant 15-22. article

the exercise of its rights under In the cases referred to in Article 11 (2), it is

data manager is the person concerned 15-22. his request to exercise his rights under Article a

you cannot refuse to fulfill it, unless you prove that the person concerned is unable to pay

way to identify.

(50) According to points a) and b) of Article 5 (1) of the GDPR, the processing of personal data

it must be carried out legally and fairly, as well as in a transparent manner for the data subject

("legality, due process and transparency"); collection is only specified, be done for a clear and legitimate purpose, and they should not be treated together with these purposes in a non-negotiable manner; in accordance with Article 89 (1) does not qualify as such incompatible with the original purpose for the purpose of archiving in the public interest, scientific and further data processing for historical research or statistical purposes ("for purpose constraint").

(51) Pursuant to points b)-d), f) and i) of Article 58 (2) of the GDPR, the supervisory authority acting in its corrective capacity:

b) condemns the data manager or the data processor if its data management activities violated the provisions of this regulation;

c) instructs the data controller or the data processor to fulfill e your request regarding the exercise of your rights according to the decree;

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 - harmonize e with the provisions of the decree;

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

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.

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(52) Based on Article 83 (2) of the GDPR, administrative fines are the given case depending on its circumstances, referred to in points a) to h) and j) of Article 58 (2).

must be imposed in addition to or instead of measures. When deciding whether there is a need- for the imposition of this administrative fine, or the amount of the administrative fine sufficiently in each case must be taken into account

the following:

the)

the nature, severity and duration of the infringement, taking into account the one in question

the nature, scope or purpose of data management, as well as the number of data subjects whom the

affected by the infringement, as well as the extent of the damage suffered by them;

the intentional or negligent nature of the infringement;

damage suffered by the data controller or data processor

any measures taken to mitigate;

the degree of responsibility of the data controller or data processor, taking into account

the technical and organizational ones undertaken by him on the basis of Articles 25 and 32

measures;

relevant previously committed by the data controller or data processor

violations of law;

with the supervisory authority to remedy the violation and the violation may be negative

extent of cooperation to mitigate its effects;

categories of personal data affected by the breach;

the manner in which the supervisory authority became aware of the violation is peculiar

taking into account whether the data manager or the data processor announced the

infringement and, if so, in what detail;

if against the concerned data manager or data processor previously -

in the same subject - ordered referred to in paragraph 2 of Article 58

one of the measures, compliance with the measures in question;

whether the data manager or the data processor has complied with Article 40

to approved codes of conduct or approved certification under Article 42

for mechanisms; as well as

other aggravating or mitigating factors relevant to the circumstances of the case

factors, such as as a direct or indirect consequence of the infringement

financial gain or loss avoided.

b)

c)

d)

e)

f)

d)

h)

i)

j)

k)

(53) Based on points a) and b) of Article 83 (5) of the GDPR, the following provisions

violation - in accordance with paragraph (2) - in the maximum amount of EUR 20,000,000

with an administrative fine, and in the case of businesses, the previous financial year is complete

must be hit with an amount of no more than 4% of its annual world market turnover, with the fact that a

of the two, the higher amount must be imposed:

a) the principles of data management - including the conditions of consent - of Articles 5, 6, 7 and 9

appropriately;

b) the rights of the data subjects 12-22. in accordance with article

(54) Infotv. 75/A. According to §, the Authority is contained in paragraphs (2)-(6) of Article 83 of the GDPR

exercises its powers taking into account the principle of proportionality, in particular by

that the processing of personal data is regulated by law or the European Union

the first violation of regulations specified in the mandatory legal act

in case of remedying the violation - with Article 58 of the General Data Protection Regulation

in accordance - primarily with the warning of the data manager or data processor

takes action.

(55) The Art. According to § 10, paragraph (1), a customer is a natural or legal person, other organization whose right or legitimate interest is directly affected by the case, to whom

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(for which) the official register contains data, or who (which) is official brought under control.

In the present procedure, since the requested official decision is the Data Controller's right or its legitimate interest is directly affected, the Applicant is the Art. According to paragraph (1) of § 10 - participates as a client with an adverse interest.

(56) Infotv. Based on paragraph (1) of § 60/A., in the official data protection procedure, the administrative deadline of one hundred and fifty days, which does not include the facts from the invitation to provide the data necessary for its clarification to its fulfillment spreading time.

(57) The Art. Based on § 51, subsection (1), point b), if the authority exceeds the administrative deadline, as a fee to be paid for conducting the procedure or according to the law on fees for administrative official procedures, or kind of services

corresponding to the administrative service fee paid for use (hereinafter: fee).

amount, failing which ten thousand forints will be paid to the requesting client, who will be exempted also from the payment of procedural costs.

administrative

III. Decision

III.1. Access request (Article 15 (3) GDPR)

(58) The Authority established that the Respondent on the Applicant's personal data professional data processing carried out can be grouped as follows:

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-

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Data sheet;

health data provided by the Applicant;

personal data generated during the professional activity of the Applicant.

(59) The Applicant turned to the Authority specifically because he did not know the latter to receive from the Application based on its access request.

(60) The Respondent provided an itemized list of the items he used in his professional activities about instruments. The Respondent's statements did not cover the question

what kind of data management operations are carried out using instruments (recording, processing, storage, etc.). At the same time, he submitted that the individual instruments by him lists the listed data types and they also "generate comparative reports". THE

Documents produced in this way about the Applicant and not handed over to the Applicant submitted to the Authority in duplicate.

(61) The Respondent did not dispute that the applicants for the transfer of these documents did not comply with the request. He gave his reasons for this, as well as emphasized that the personal data in question is the relevant deletion request it is kept until it is submitted, namely with the aim that the person concerned - in this case the Applicant - can hand them over upon request.

(62) In relation to the reasons for refusal formulated by the Applicant, the Authority is makes the following findings:

(63) In relation to the "D" program, the Respondent claimed that these data were provided by a the Applicant received during the examinations. This claim is not supported by evidence supported it, but in the present case this has no significance. With the "D" program related reason is not relevant, because the access request is fulfilled with this in mind cannot be legally denied in any way.

The release of findings during the investigation is not the result of the exercise of the rights of the data subject, in such cases the Respondent is merely following its own general business practices. Since the tests copies were not issued following the request of the Applicant, under the GDPR, this does not qualify as the first time an access request is made of its fulfillment. It is worth noting that by submitting an access request it is In any case, this right of the affected parties is not exhausted, so it is - only theoretically - yet again even in the case of an access request, the copies could not be issued with reference to it to deny that the Respondent had previously handed them over.

Based on the technical descriptions available for the program, the data is Applicant there is no technical obstacle to its transfer to, and the Applicant has no such obstacle did not refer either.

(64) With regard to the "N" program, the Respondent did not indicate a substantive reason, a access request not at all

supported it. Based on the technical descriptions available for the program, it is there are no technical obstacles to the transfer of data to the Applicant The Respondent did not refer to any obstacle either.

refusal to perform e

(65) In relation to the "S" instrument, the Respondent claimed that the data from the instrument could not obtain, in addition, in this regard, he also referred to the fact that the Applicant it was not clear from his request which data copies were specifically for release applies. Since the Authority requested the submission of the document by the Applicant he was able to do so, obviously he would have been able to do so before. If it is not clear, which data the Applicant requests to be released in this regard, then either steps are required to clarify the request or provide a copy of all data, which is here

may arise. Taking all this into account, the indicated reasons are the access request

the obstacle to its performance was not substantiated in connection with the "S" instrument either.

"energetic

integrators

(for example, the

(66) In addition to these reasons, the Respondent also submitted in his first statement to the Authority,

that, according to his opinion, the documents produced using the instruments are personal

they do not contain data. At the same time, the responses given to the Requested Authority are

The documents submitted by him and the instruments available from public sources are technical

based on his descriptions, this is not confirmed.

In the "N" program, the ra is indicated specifically in connection with the Applicant's name

applicable 17.07.2020. daily values

-

reference data'); in one of the views of the "N" program, it is also explicitly stated a

In connection with the name of the applicant, in a separate column, the "date of the last measurement"

date data.

Medicinal preparations are included in the documentation of the "S" instrument, for example

Current dosage recommendations intended for the applicant, sometimes information by the applicant

about your personal complaints.

The documentation produced with the "D" program contains the Applicant's various

comparisons of the results of measurements of the same type carried out on dates; the

19.04.2022 the Applicant is specifically named in the daily documentation, whose

among other things, e.g. ECG data, electrical activity splint map data,

data of functional status indicators, etc. – the document is of different dates

presents in a comparative overview.

Based on all this, the documentation produced with the instruments about the Applicant has been submitted

it can also be determined from the copies that they contain the Applicant relevant personal data.

In addition, the Respondent clearly did not use the instruments in question only for that purpose he used to "lead" the data types he marked into them (for this purpose any device capable of carrying data would be sufficient), but also that

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evaluate and analyze specific data using the instruments.

It should be noted that by the Respondent

marked as a data type

than data types, these documents contain many more data types (cf. the present paragraph (11) above of the reasons for the decision).

(67) By entering the Applicant's data into the instruments, using the instruments

created, which apply to the Applicant

such data and documents

contained information, so it is personal according to Article 4, point 1 of the GDPR

are considered data and the rights of data subjects provided for in the GDPR belong to the Applicant

can practice in relation to

they came

(68) Based on the Data Sheet, it is clear that the Applicant's identification and e-mail address

the Respondent was able to identify, and the Applicant's multiple contacts

knew, so his claim that the access

please

telephone

it was a contact attempt. (For the latter, the Applicant only uses the "S" instrument

(referred to in connection.) If the Respondent was able to write to the Applicant by e-mail,

that he refuses to fulfill the data subject's request for "data security reasons", then it would have happened

way to ask him by e-mail the clarifying questions that he wanted to ask over the phone

to ask the Applicant.

failed multiple times

- obstacle a

of its fulfillment

- one

(69) The described content of the Respondent's referenced e-mail ("the materials recorded by us,

I can't send it to you for data security reasons") is very different from how it is

in its response to the Authority, the Respondent stated its interpretation. Given

In this situation, the Applicant cannot be blamed for not taking action on the stakeholder's request

in order to clarify, since the Respondent did not ask any questions or requests in this regard

formulated. Based on the revealed facts, the Requester's request for access

was interpretable. If for some reason the data controller is uncertain about the requested data,

then it is his obligation to do what is necessary to clarify this

steps, in case of failure to do so, the personal data in its management is complete

can also perform properly with its release.

(70) In relation to the Authority's questions regarding the custody time, the Respondent said

stated that the custody period for "time of service" means that a

Requested by the Applicant possible

processed by the Applicant until the cancellation request

preserves documents with the aim of providing them to him at the request of the Respondent

can give In the present case, this very goal was thwarted, namely without a substantial reason.

(71) Regarding the Respondent's claim that behind the access request

the dispute between the Applicant and the Respondent regarding the suitability of the service

stands, the Authority wishes to emphasize that the persons concerned do not

they are obliged to give reasons. The fulfillment of such requests is not a relevant concern

subject to justification or some kind of data manager consideration, but the data manager objective

legal obligation. The gender between the Applicant and the Respondent

furthermore, the Authority has no authority to adjudicate data management disputes.

(72) In view of the above, the Respondent would have been obliged to treat the Applicant for full release of copies of personal data. There is a good reason to fulfill this refused without.

III.2. Providing data management information (GDPR Article 13 (1)-(2) and Article 12

(1)

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(73) In addition to a the access request as assessed above fulfillment

was unlawfully absent, an additional problem is that the Applicant generally did not know to find out about the handling of personal data by the Respondent, according to Article 13 of the GDPR to know information.

(74) The Respondent did not provide the Applicant with relevant information to the Authority was not provided in the submitted data management information sheet, nor on the Data Sheet. The referenced data management information is the only data management information available on the website of the Applicant information sheet. However, this is related to professional services objective

does not affect data management in general, the information included there is the Requested refers to your activities related to your webshop.

(75) Given the nature of the services provided by the Respondent, it is particularly important that the Applicant can find out about it even after using the services about the exercise of your data subject rights and that your data is still being processed-

e. If there may be an interest in these data being processed for a long time they should be available even after using the service, they are not incorrect efforts made regarding its preservation, but only legally established data management practice and in addition to providing relevant information to those concerned. There are many good solutions to how the access request can be kept together in the long term, that is data security and the interest in the proper identification of the affected persons even after the years. If however, the practice related to custody is formed unilaterally, if that only the data controller has relevant information, and the data subject does not not even aware of whether your data is being processed, then the established situation may result in the data management being the stakeholder's insight and influence will take place without the possibility.

(76) In the present case, the information regarding data management was not available, so it is not from source information to the Applicant such regarding data management could have.

(77) Regarding the relevant obligation of the Respondent, the Authority took into account a Established on the basis of Article 12 (1) GDPR and Article 29 of Directive 95/46/EC Adopted by the Data Protection Working Group, the application and interpretation of the GDPR facilitating guidelines on transparency (hereinafter: Guidelines)^{6 11}. point too. The latter considers it good at providing "easily accessible" information practice, if information on data management is available on the website. These basis, it would have been justified for the Applicant to publicly, possibly through individually registered online user accounts or other, easy provide information to those concerned, including the Applicant, in an accessible manner

for him, strange

information sheet is different

makes it available in connection with its service. The Applicant is Article 13 of the GDPR

for data management information in a manner that also violates Article 12 (1) of the GDPR

did not have access to, general data management related to material data management, retention time

the Respondent was unable to provide information.

considering that the Respondent

such

III.3. Promotion of the exercise of data subject rights (GDPR Article 12 (2))

(78) The Respondent would have been obliged to promote the Applicant's exercise of stakeholder rights. This

it was not implemented either in the handling of the specific stakeholder request or in general.

6 The WP260

detail.cfm?item_id=622227; Hungarian version: https://www.naih.hu/files/wp260rev01_hu.pdf

guideline

available:

rev.01.

below

link

the

<http://ec.europa.eu/newsroom/article29/item->

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legal remedy

(79) The actual data management practices of the Respondent, related to the data management of the data subjects

your rights,

lack of information, the Applicant

made it difficult for him to exercise his rights. The Applicant with the purpose indicated as the reason for the retention and that

he could not be aware of any specific custody period related to it. Thereby the information and the exercise of the right of access by the Respondent in general helped him.

presenting its possibilities

(80) Furthermore, it can be seen from the correspondence that the Respondent did not take any steps in the specific case either

to promote the exercise of the rights of the affected parties. The access request is partially not fulfilled it, but did not inform the Applicant of the (otherwise incorrect) reasons for this, did not provide him with legal remedy information either. He didn't offer one alternatives, according to which he sees the fulfillment of the request of the interested party as possible, no did not ask for clarification of the access request, nor did he indicate that the access cannot interpret a request without further clarification.

(81) Regarding the latter, it should be emphasized that although in the present case the access request was sufficiently specific even without further clarification, if the Respondent considered it so and that it is not possible for him to fulfill it without additional information, steps should have been taken to provide this information

acquire it and thus be able to fulfill the stakeholder request. If it's on the phone it is not possible, then you have to try other contact channels. THE

The Respondent also knew the Applicant's postal and e-mail contact details, those a Recorded on the Applicant's Data Sheet. The Applicant's Data Sheet is owned by the Applicant according to his admission, he hired the Applicant in part because of the information provided to identify

made from a surface

based on the data shown in the screenshot, when corresponding with the Applicant a

The applicant used his validated e-mail address. The Respondent by e-mail with the Applicant maintained regular and direct contact, during these e-mail exchanges he never indicated

that the Applicant's person or e-mail address cannot be identified. Pertaining to this
the Respondent did not make any claims during the present procedure either. Based on all this, the access
The Applicant could have asked any clarifying questions regarding the application
to the Applicant, even by e-mail, if he considered it necessary, but directed to this
meritorious
happened

no attempt to contact you via any other channel (e.g. by post) has been verified.

you know Data Sheet and Microsoft Access

steps taken by the Applicant

act, as with a similar purpose

(82) In view of the above, the Respondent in fulfilling the Applicant's access request

it did not facilitate the exercise of the rights of the affected parties, it was not proactive in such a way that

he must have been aware that the Applicant was affected as a result

the exercise of rights by the documents and test results produced by the Respondent

makes it impossible in terms of

III.4. Violation of certain fundamental provisions (GDPR Article 5 (1) points a) and b)

III.4.1. the principle of transparency

(83) In addition to the fact that the provisions referred to in Article 13 and Article 15 of the GDPR are violated,

the data processing of the Respondent also violates transparency in the broader sense

made it happen.

(84) The Respondent made statements to the Authority based on which

in his opinion, the data entered into the instruments are not personal data and the

does not perform data management with instruments ("the above documentation does not contain personal data

contain, the data will be fed into the listed programs, after that

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however, the created documentation does not contain such data"; "the "S" instrument

the documentation created by (...) does not contain personal data"; "the Applicant (...) does not carry out further data management beyond the fact that the indicated instruments, enter the above-mentioned data into the software").

(85) At the same time, the Respondent submitted that the customer data sheets and measurement results it is kept until "a request is received from them [those concerned] for deletion", it so that they can be issued at the request of customers even years later ("The main reason [for preservation] is that...even after years, the previous ones can be released generated documents").

(86) This raises several questions from the point of view of transparency. The latter position is not coherent with the statement that the Respondent - at least partially - does not consider it personal data is the data produced by the instruments. In addition, the relevant in the absence of data management information, it is not practical for the affected parties - including the Applicant understood here - they will be able to exercise their stakeholder rights that they do not know about, etc regarding data management, which they may not even know about "years later", that they are still in progress.

(87) With regard to the medical nature of the Respondent's service, a Data collected from the applicant nature (health data), the relevant to the complete lack of data management information and to the fact that the Applicant Budapest Capital City Government office XI. he turned to the district office because - as he wrote in his application - he suspected that the Respondent was carrying out his activities illegally, a Under the given circumstances, the applicant may have reason to believe that the purpose of the data management provision of health care services. This can be blamed on the Respondent even if the purpose of the data management was not actually a health service, because it is he caused such a lack of transparency.

(88) The Respondent knew about the Applicant's underlying illness, from him in the course of his activities

received health data that is considered special data. All special data

management, as well as increased data controller responsibility due to the vulnerable situation of the Applicant charged the Applicant to ensure that its data management was transparent, which it was not realized.

(89) In its assessment, the Authority also took into account the fact that Article 5 (2) of the GDPR based on paragraph (principle of accountability), the Respondent is not only obliged to fulfill its data controller obligations, but also to ensure that can prove compliance. It was done in order to comply with the principle of transparency data controller action was not verified by the Respondent with any documents or evidence.

III.4.2. the principle of purposefulness

(90) According to the public data of the company register, the main activity of the Respondent is: "Physical well-being improvement service", its other activities include "Other human health care".

According to the copy of the public document submitted by the Applicant to the Authority, the Applicant is the Applicant does not have a license to provide healthcare services.

In his statement to the Authority, the Respondent stated that "Physical well-being improves performs a service and not a health activity'.

(91) For the purpose of providing healthcare services, the Respondent may not legally treat data, so the very purpose of such data management would be illegal.

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At the same time, the Authority is not aware of this illegality based on the revealed facts to establish, given that the data management of the Respondent was not transparent and no evidence clearly pointing to such a purpose has become known in the present proceedings.

(92) In his statement to the Authority, the Respondent stated that the instruments were a regularized and used it and with this in order to provide its services

in this context, the legal basis for data processing is the fulfillment of the contract.

(93) However, it can be established that the Respondent also made statements with content such as

To the authority, on the basis of which, according to his opinion, the data entered into the instruments are not

personal data and does not perform data management with the instruments ("the above documentation

they do not contain personal data, the data is for input into the listed programs

are incurred, however, after that, the created documentation does not contain such data

contain"; "the documentation created by instrument "S" (...) personal data

does not contain"; "the Respondent (...) does not carry out further data management beyond the fact that a

enter the data indicated above into the indicated instruments and software").

(94) Furthermore, the statement made regarding the custody time is also partly relevant here. THE

In his requested statements there was a statement that the data

it is kept for the purpose of fulfilling any requests by the Requested Party

knows ("the main reason [for preservation] is that...even after years, they can be released a

previously created documents"). Please note that this is not a data management purpose,

but existing in connection with data processing carried out for a specific purpose

stakeholder right. In the specific case, the stakeholder request was also not fulfilled, through which

even the "purpose" of the data processing according to the logic of the requested person is called into question,

since the Requested did not hand over some of the requested copies of the stored data.

(95) The Respondent's relevant statements thus contradict each other. Not possible

simultaneously questioning the data management quality of an activity and at the same time

indicate the purpose and legal basis of the same data management; in addition, the right of the affected person is not

can be interpreted as a data management purpose. There were no relevant statements from the Respondent

consistent with each other, clear about the purpose of the data management under investigation,

the Respondent was unable to present a coherent position.

(96) The above practice of the Respondent violates the principle of being bound by a goal, which is also illegal,

if data processing for the purpose of health care cannot be proven.

III.5. Legal consequences

III.5.1. Access request (Article 15 (3) GDPR)

(97) Based on the above, the Authority established a violation of Article 15 (3) of the GDPR and based on points b) and c) of Article 58, paragraph (2) of the GDPR, are contained in the statutory part decided according to

III.5.2. Providing data management information (GDPR Article 13 (1)-(2) and 12.

Article (1)

(98) On the basis of the above, the Authority considers paragraphs (1)-(2) of Article 13 of the GDPR and Article 12 of the GDPR

(1) and Article 58 (2) b) and d) of the GDPR

based on its points, decided in accordance with the provisions of the operative part.

III.5.3. Promotion of the exercise of data subject rights (GDPR Article 12 (2))

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(99) Based on the above, the Authority found the violation of Article 12 (2) of the GDPR established and based on points b) and d) of Article 58 (2) of the GDPR, by the holder decided in accordance with the provisions of

III.5.4. Violation of certain fundamental provisions (GDPR Article 5 (1) points a) and b)

(100) Based on the above, the Authority based on the GDPR Article 5 (1) point a) (transparency principle) and point b) (principle of purpose-boundness) established the violation and Article 58 of the GDPR. on the basis of points b), d) and f) of Article (2), in accordance with the provisions of the operative part decided

III.5.5. Fine

(101) III.5.5.1. The Authority rejects the Applicant's request for a data protection fine application, as the application of this legal consequence affects the right or legitimate interest of the Applicant does not directly affect him, such a decision of the Authority does not create a right or obligation for him arises, as a result of this – falling within the scope of public interest enforcement –

regarding the application of legal consequences in relation to the imposition of fines a

The applicant does not qualify as a customer under Art. Based on § 10, paragraph (1), or because it

Acr. The submission of an application in this regard does not comply with § 35, paragraph (1).

it has no place, this part of the submission cannot be interpreted as a request.

(102) III.5.5.2. At the same time, the Authority examined ex officio whether the Application was justified

ex officio imposition of a data protection fine. In this context, the Authority is the GDPR

Paragraph 2 of Article 83 and Infotv. 75/A. of the case was considered by all

circumstances and found that in the case of the violation discovered during the present procedure, the

a warning is neither a proportionate nor a dissuasive sanction, therefore a fine

imposition is required.

(103) When imposing the fine, the Authority took into account the following aggravating factors:

- Violations committed by the Respondent in the higher fine category

are considered a violation of the law. The Authority assessed it as a serious violation of the law

violation of the principle of transparency and the principle of purpose-boundness, as well as the Applicant

violation of the rights of data subjects according to Articles 13 and 15 of the GDPR, taking into account that a

The Respondent was aware of the Applicant's serious underlying illness [Article 83 (5) GDPR

points a) and b)].

- The Respondent intentionally followed the violations related to the stakeholder request

away, did not provide data management information about material data management as otherwise

regarding his activities, he completed it on his website, for the stakeholder request

made its related decisions on the basis of individual consideration, the disadvantages caused are

during the handling of an individual case, he had to recognize it and the cause of these disadvantages

consented [Article 83(2)(b) GDPR].

- The Requester was burdened with increased data management responsibility, taking into account the wording

the nature and scope of ongoing data management and, on the one hand, the fact that the Applicant

in view of his underlying illness, the Applicant has been enhanced to fulfill the stakeholder request

interest, on the other hand, the fact that the violation of Article 13 of the GDPR a

It affects the entire clientele that uses the professional activity of the respondent in question, who
in the absence of data management information, not with sufficient insight into specific data management
could have [GDPR Article 83 (2) point a)].

- The examined data management affects special categories of personal data, in view of
GDPR Article 4, point 15 [GDPR Article 83 (2) point (g)].

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(104) When imposing the fine, the Authority took into account the following mitigating factor:

- The Applicant's previous offense is relevant

it has not yet been due to infringement

convicted [GDPR Article 83(2)(e)].

- The Authority exceeded Infotv during the procedure. administrative according to paragraph (1) of § 60/A
deadline.

(105) In view of the above, as well as the fact that according to the Respondent's 2021 report
net sales revenue (...), - forints, the imposed data protection fine does not exceed the amount that can be imposed
maximum fine (i.e. HUF (...)).

(106) On the basis of the above, the Authority, on the basis of point i) of Article 58 (2) of the GDPR, the
decided in accordance with the provisions of

ARC. Other questions

(107) IV.1. During the procedure, the Authority exceeded Infotv. According to paragraph (1) of § 60/A
administration deadline of one hundred and fifty days, therefore the Ákr. Based on point b) of paragraph (1) of § 51
ten thousand forints is due to the Applicant - at his choice - by bank transfer
with postal order.

(108) IV.2. This decision of the Authority is based on Art. §§ 80-81 and Infotv. § 61, paragraph (1).
is based on. The decision of the Ákr. Based on § 82, paragraph (1), it becomes final upon its publication. The
Acr. § 112 and § 116, paragraph (1) and § 114, paragraph (1) with the decision

on the other hand, there is room for legal redress through a public administrative lawsuit.

* * *

(109) The Art. According to § 135, subsection (1), point a), the obligee is liable for the legal interest is obliged to pay an appropriate amount of late fee if the payment obligation does not comply within the deadline.

(110) The Civil Code 6:48 a.m. Pursuant to paragraph (1) of § starting from the date of fall, it is valid on the first day of the calendar semester affected by the delay is obliged to pay default interest equal to the central bank base rate.

(111) The rules of the administrative trial are set out in Act I of 2017 on the Administrative Procedure (hereinafter: Kp.) is determined. The Kp. Based on Section 12 (1), the Authority the administrative lawsuit against his decision falls under the jurisdiction of the court, the lawsuit is referred to the Kp. On the basis of § 13, paragraph (3), point a) point aa), the Metropolitan Court exclusively competent. The Kp. Under the jurisdiction of the court based on point b) of § 27, paragraph (1). legal representation is mandatory in a lawsuit. Cp. According to paragraph (6) of § 39 - if the law states otherwise does not provide - the submission of the claim is an administrative act does not have the effect of postponing its entry into force.

(112) The Kp. Paragraph (1) of § 29 and, in view of this, the 2016 Code of Civil Procedure CXXX. Act (hereinafter: Pp.) is applicable according to § 604, the electronic CCXXII of 2015 on the general rules of administration and trust services. Act (hereinafter: E-Administration Act.) According to Section 9 (1) point b) the customer legal representative is obliged to maintain electronic contact.

(113) The time and place of filing the statement of claim is specified in Kp. It is defined by § 39, paragraph (1). The information about the simplified trial can be found in Kp. Paragraphs (1)-(2) of § 77 and § 124

It is based on paragraph (1) and (2) point c) and (5) respectively. The public administration the amount of the fee for the lawsuit is determined by Act XCIII of 1990 on fees. law (hereinafter: Itv.)

45/A. Section (1) defines. Regarding the advance payment of the fee, the Itv. Section 59

(1) and § 62 (1) point h) exempts the party initiating the procedure.

(114) If the Respondent does not adequately certify the fulfillment of the prescribed obligation, a

The authority considers that it has not fulfilled its obligation within the deadline. The Akr. § 132-

according to, if the Respondent does not comply with the obligations contained in the Authority's final decision

fulfilled, it is enforceable. The Authority's decision in Art. According to paragraph (1) of § 82 a

becomes final with notification. The Akr. Execution pursuant to § 133 - if you are a law

government decree does not provide otherwise - it is ordered by the decision-making authority. The Akr.

Pursuant to § 134, enforcement - if it is a law, government decree or municipal regulation

in official matters, the decree of the local government does not provide otherwise - the state

tax authority

Infotv. Pursuant to Section 60 (7), the Authority

reserved, to perform a specific act, defined

in its decision

in relation to an obligation to conduct, tolerate or cease a

the implementation of the decision is undertaken by the Authority.

undertakes. The

(115) Based on Article 57 (1) point a) of the GDPR, the data protection authorities of the Member States

task is to monitor and enforce the application of the GDPR.

(116) Infotv. Based on paragraphs (2)-(2a) of § 38, the Authority is responsible for personal data

for its protection, as well as to learn about data of public interest and public in the public interest

monitoring and facilitating the enforcement of the right, as well as personal data

Facilitating its free flow within the European Union. General data protection

the tasks and powers established for the supervisory authority in the decree a

General data protection for legal entities under the jurisdiction of Hungary

is exercised by the Authority as specified in the decree and Infotv.

The Authority's jurisdiction covers the entire territory of the country.

Dated: Budapest, according to the electronic signature

Dr. Attila Péterfalvi

president

c. professor

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