

## Privacy Policy for visitors to the IPmindenkinek.hu website

### 1. Controller of personal data

Controller's

- name: Hungarian Intellectual Property Office
- seat: 1081 Budapest, II. János Pál pápa tér 7.
- postal address: 1438 Budapest, pf. 415.
- phone number: 06-1/312-4400
- e-mail address: sztnh@hipo.gov.hu

### 2. Name and contact details of the Data Protection Officer of the controller

Data Protection Officer's

- e-mail address: adatvedelem@hipo.gov.hu
- phone number: 06-1/474-5941
- postal address: 1438 Budapest, pf. 415.

### 3. Categories and source of personal data concerned, purposes, legal basis and duration of processing

<b>Purposes of processing</b>	to collect the statistical information necessary for the development of the website and to carry out analyses on the number of visits and usage (statistical purpose), as well as to prevent or allow the detection of possible abuses (information security purpose)
<b>Categories of personal data</b>	personal and statistical data related to the visit to the website [technical data automatically generated as personal data (logging data) in relation to the type of browser used, the Internet Protocol address (not full IP address, port number), the domain name (URL), the date of the visit, the list of pages viewed and the activity carried out on the website, with regard to the establishment and maintenance of the Internet connection)]; the Office does not use tracking technology
<b>Source of personal data</b>	data subject
<b>Legal basis of processing</b>	the legal basis for statistical processing is the consent of the data subject (Article 6(1)(a) GDPR); the legal basis for processing for information security purposes is processing in the public interest (processing is necessary for the performance of tasks carried out in the public interest; Article 6(1)(e) GDPR, subject to the provisions of Act L of 2013)
<b>Duration of processing</b>	processing is carried out for one year for statistical purposes and for eight years for information security purposes; the processing of statistical data not containing personal data continues to take place indefinitely

### 4. Information concerning cookies

A cookie is a small data file that can serve multiple purposes. The use of the IPmindenkinek.hu website is accompanied by cookies that are necessary for its functioning and supporting the session, as well as cookies for analytical purposes and to record the cookie declaration. The functionality and session support cookies are necessary for the website to work, without them the IPmindenkinek.hu website will not function. The other cookies require the data subject's consent,

which they are not obliged to give. You may opt out of the installation of these cookies at any time by changing the settings on your computer, or you may remove the cookies from your computer at any time.

The Office uses the following cookies on the IPmindenek.hu website:

- functional cookies that are necessary for the use of the website and that will be deleted at the end of the session,
- a cookie recording your decision to consent to the use of cookies, which will be deleted after one day,
- cookies used for statistical purposes to enable us to keep track of visitors to the website and to learn about the use of the IPmindenek.hu website, which will be deleted after one year,
- cookies to record statistical data on page views, which will be deleted after one year.

## **5. Recipients of personal data, transfer of data**

The Office does not use a data processor for the operation of the IPMindenek.hu website; for statistical data analysis, it uses the data processing services of Google LLC by using Google Analytics.

Processor's

- name: Meta Platforms Ireland Limited
- seat: 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland
- website contact details: <https://about.meta.com/>

In the event of a failure or other problem in the IT systems of the Office, the systems containing personal data may be accessed not only by the relevant staff of the Office but also by duly authorised staff of the data processor responsible for performing certain operational tasks of the IT infrastructure of the Office.

Processor's

- name: Novell Professzionális Szolgáltatások Magyarország Kft.
- seat: 1117 Budapest, Neumann János utca 1. A épület II. emelet
- website contact details: <https://www.npsh.hu/>

The log analysis for information security purposes to be carried out by the Office will also involve the duly authorised staff of the data processor entrusted with this task.

Processor's

- name: Invitech ICT Services Kft.
- seat: 2040 Budaörs, Edison utca 4.
- website contact details: <https://www.invitech.hu/>

The Office does not transfer personal data to other data controllers, third countries or international organisations. If proceedings are instituted before a court or other authority which require the transfer of personal data or documents containing personal data to the court or authority, the court or authority may also have access to the personal data.

## **6. Data security**

The Office and its processors shall have the right to access the data subject's personal data to the extent necessary for the performance of their tasks or duties. The Office shall take all security, technical and organisational measures necessary to ensure the security of personal data.

## **Organisational measures**

The Office allows access to its IT systems with access rights that can be linked to an individual. The principle of "necessary and sufficient rights" applies to the allocation of access, i.e. all users may use the IT systems and services of the Office only to the extent necessary for the performance

of their tasks, with the corresponding rights and for the necessary duration. Only a person who is not restricted for security or other (e.g. conflict of interest) reasons and who has the professional, business and information security skills necessary to use the IT systems and services safely may have the right to access them.

The Office and its data processors are bound by strict confidentiality rules and are required to act in accordance with these confidentiality rules in the course of their activities.

### **Technical measures**

The Office stores the data on its own equipment in a data centre. The IT tools that store the data are stored in a separate, locked server room with an alarm system, protected by a multi-level access control system with authorisation control.

The Office protects its internal network with multiple layers of firewall protection. The access points to the public networks used are always equipped with hardware border protection devices (firewalls). Data are stored by the Office on multiple servers to protect them from destruction, loss, damage due to malfunction of IT equipment, or from unlawful destruction.

The Office protects its internal networks from external attacks with multiple layers of active, complex malware protection (e.g. virus protection). Indispensable external access to the IT systems and databases operated by the Office is provided via an encrypted data connection (VPN).

The Office does its utmost to ensure that its IT tools and software are always in line with the technological solutions generally accepted in the market.

The Office is developing systems to control and monitor operations and detect incidents (such as unauthorised access) through logging.

## **7. Data subjects' rights in relation to data processing**

For more information about YouTube's privacy practices, please visit <https://policies.google.com/privacy>, or if you have any questions, please contact the Data Protection Officer at Google Ireland Limited by filling in the form on the interface at <https://support.google.com/cloud/contact/dpo>.

### **Data subjects' rights in relation to the processing of their data by the Office**

#### **a) The rights of the data subject with regard to data processing**

If the data subject submits a request concerning the processing of personal data by the Office, the latter shall inform the data subject of the measures taken or the reasons for non-taking of such measures within one month at the latest from the day following the receipt of the request, and in the case of not taking measures shall inform the data subject of his or her right to lodge a complaint and to seek judicial remedy. If the complexity or number of requests received by the Office so justifies, the Office may extend the time limit by up to two additional months. The Office will inform the person concerned of the extension and the reasons for it within one month of receipt of the request.

In order to protect the rights of the data subject and to meet the requirements of data security, the Office will verify the identity of the data subject and the person to whom the rights relate, and will request additional information where necessary.

## **b) Right of access**

The data subject has the right to be informed by the Office whether or not his or her personal data are being processed and, if so, to be informed in particular of

- the purposes of the processing;
- the categories of personal data processed;
- the recipients or categories of recipients to whom or to which the Office has communicated or will communicate the personal data (including, where applicable, the safeguards for the transfer);
- the envisaged duration of the storage of personal data or the criteria for determining that duration;
- the right to request the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data;
- the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information;
- if the data is not from him or her, the source of the data.

Upon request, the Office will provide the data subject with a copy of the personal data it processes or of a document containing such data, provided that this does not adversely affect the rights and freedoms of others. It will comply with the first copy request free of charge, after which it will charge a reasonable fee based on administrative costs or refuse to provide a copy.

## **c) Right to rectification**

The data subject shall have the right to obtain from the Office the rectification of inaccurate personal data concerning him or her and, taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed.

## **d) Right to erasure**

The data subject has the right to request the deletion of his or her personal data, which the Office will comply with, unless one of the following grounds applies: the data to be erased are necessary for the exercise of the right to freedom of expression and information; for compliance with an obligation under Union or Member State law; for the performance of a task carried out by the Office in the public interest or in the exercise of official authority vested in the Office; in the public interest in the field of public health; for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes; or for the establishment, exercise or defence of legal claims.

## **e) Right to restriction of processing**

The data subject has the right to have the processing of his or her personal data restricted by the Office at his or her request, where

- the accuracy of the personal data is contested by the data subject;
- the processing is unlawful but the data subject opposes the erasure of the data and requests the restriction of their use;
- the Office no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
- the processing is based on the performance of a task carried out in the public interest or in the exercise of official authority vested in the Office, and the data subject objected to the processing.

Personal data subject to restriction will be processed by the Office, except for storage, only with the consent of the data subject and for the establishment, exercise or defence of legal claims, the

protection of the rights of another natural or legal person or an important public interest of the European Union or of a Member State.

The Office will inform in advance the person at whose request the processing has been restricted of the lifting of the restriction.

**f) Right to object**

The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data where the processing is based on Article 6 (1)(e) of the GDPR, if the data subject considers that the Office is not processing his or her personal data fairly in relation to the purposes stated in this notice. The Office is entitled to continue to process the data despite the objection, if the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.

**g) Right to data portability**

The data subject shall have the right to receive personal data concerning him or her which he or she has provided to the Office in a structured, commonly used, typewriter-readable format, or to request that the Office transfer the aforementioned data to another controller, where the processing is based on Article 6 (1)(b) GDPR and is carried out by automated means.

The exercise of this right must be without prejudice to the right to erasure and the right to be forgotten.

This right may not be exercised if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Office.

The exercise of this right must not adversely affect the rights and freedoms of others.

**8. Exercise of rights after the death of the data subject<sup>1</sup>**

Within five years of the death of the data subject, the rights of access, to rectification, erasure, restriction of processing or objection may be exercised by the person whom the data subject has authorised by administrative act or by a declaration in a public deed or private document having full probative value made to the Office.

In the absence of a declaration, the rights to rectification and objection and, where the processing was already unlawful during the lifetime of the data subject or the purpose of the processing ceased to exist upon the death of the data subject, the rights to erasure and restriction of processing shall be exercised by the close relative of the data subject (spouse; direct relative; adopted, step- and foster child; adoptive, step- and foster parent; and sibling) who is the first to exercise this right.

The person enforcing the rights must provide proof of the fact and date of the death of the person concerned by means of a death certificate or a court order, and proof of his or her identity and, where necessary, of his or her status as a close relative by means of a public deed.

The person asserting the rights shall then be granted the rights and be subject to the obligations established for the person concerned.

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<sup>1</sup> Provisions laid down in Section 25 of the Information Act

The Office shall, on request, inform the close relative of the person concerned of the measures taken pursuant to this point, unless the data subject has prohibited this in the administrative provision referred to in the first paragraph, in a public deed or in a private document with full probative value.

## 9. Right to complain and seek redress

If you believe that your rights have been infringed as a result of the processing of your data by the Office, you may

- submit a complaint to the Office using one of the following contact details: 1081 Budapest, II. János Pál pápa tér 7., postal address: 1438 Budapest, Pf. 415., central phone number: +36-1/312-4400, central fax number: +36-1/474-5534, central e-mail address: [sztnh@hipo.gov.hu](mailto:sztnh@hipo.gov.hu), e-mail address of the Data Protection Officer: [adatvedelem@hipo.gov.hu](mailto:adatvedelem@hipo.gov.hu);
- to protect your data, you can have recourse to the courts, which will act out of turn. The action may be brought before the Budapest-Capital Regional Court (Fővárosi Törvényszék) competent for the seat of the Office (1055 Budapest, Markó utca 27, phone number: +36-1/354-6000, website: <https://fovarositorvenyszek.birosag.hu/>), or the competent court in the place of residence or domicile of the person concerned, which can be found at the following website: <https://birosag.hu/torvenyszekek>;
- you can also lodge a complaint with the National Authority for Data Protection and Freedom of Information (seat: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1374 Budapest, Pf. 603., phone number: +36-1/391-1400, fax number: +36-1/391-1410, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website contact details: <https://www.naih.hu/>).