

Privacy statement

I. Data Controller

Name of company:	InnoRail Kiadó és Konferencia Kft.
Headquarters and postal address:	1214 Budapest, Kapos utca 26. II./8.
Registration authority:	Budapest Municipal Court
Registration Number:	01-09-9720911
E-mail address:	balla.agnes@innorail.hu
Homepage:	https://innorail.hu
Complaints address:	balla.agnes@innorail.hu

II. Principles of data protection applied by the controller

1. Controller in its capacity of data controller warrants that all its data processing activities comply with the requirements specified in the present Privacy Statement, in the effective national laws and in the legal acts of the European Union.
2. Information about the data processing activities of the controller is permanently available on <https://innorail.hu> operated by the controller.
3. The controller is entitled to amending the Privacy Statement unilaterally. In case of amendments, the controller shall inform the users by publishing the amendments on its homepage.
4. The controller is committed to protecting the personal data of its clients and partners and deems its clients' information self-determination of special importance. The controller shall handle personal data confidentially and implement all appropriate technical and organisational measures that guarantee the safety of the data. The data processing practice of the controller is specified in the present Privacy Statement.
5. The data handling principles of the controller comply with the effective legal regulations on data protection, thus, more specifically, with:
 - Act CXII of 2011 on the right of self-determination in information matters and on the freedom of information;
 - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
 - Act V of 2013 on the Civil Code;
 - Act C of 2000 on accounting.
6. The controller shall only use the personal data as per the legal bases of the GDPR and limited to purpose.
7. The controller commits itself that prior to the recording and processing of any of the personal data of its users, it shall publish a clear and easy to understand communication, in a form raising awareness, that advises its users of the method, purpose and principles applied in the recording of data. In case of compliance with a legal obligation, the precept of law ordering the provisioning of data shall also be stated. The data subject shall be informed of the purpose of data processing and of who will handle and process his or her data.

8. In all cases where the controller intends to process personal data for purposes other than for which they have been collected, the controller shall inform the data subject of this fact and shall gain his or her prior, express consent and provide for the prohibition of such use by the data subject.

III. Legal basis for the processing of data, its purpose and scope of the data processed, duration of data processing, entitlement to access to personal data

1. Processing by the controller is based on the following legal bases (GDPR Article 6., Item 1):

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes (freely given consent);
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (performance of contract);
- c) processing is necessary for compliance with a legal obligation to which the controller is subject (legal obligation);
- d) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (legitimate interest).

2. In case of data processing on basis of freely given consent, the data subjects shall have the right to withdraw their consent in any phase of data processing.

3. In case of the incapacity of the data subject or limited capacity of the minor, the consent of their legal representative shall also be acquired.

4. In certain cases, processing, storage and transfer of certain personal data is necessitated by force of a legal obligation – the data subjects shall be separately informed of this fact.

5. Entities/persons providing data to the controller please note that if they do not provide their own personal data, securing the consent of the actual data subject shall be their responsibility.

6. Personal data can be only processed for specific purposes. Data processing shall meet the purpose of processing in all of its phases and recording and processing of data shall be fair and legal. Only personal data indispensable and adequate for meeting the purposes of data processing shall be processed. Personal data can only be processed to the measure and till the time required by meeting the purpose of data processing. The controller shall not use the personal data for purposes other than those stated.

7. Registration for trainings and conferences

Purpose of data processing: administration of trainings and conferences organized by the controller and of articles published in the magazine, participation for fee, documentation of payment in case of the publication of an article, and meeting accounting obligations. Further purposes of data processing are identification of the user, performance of the service, sending notices related to the service (e.g., changes in the content, date, venue and other details of the training or conference, etc.), arranging payment via the financial provider, setting up a registry of users and their distinction from each other, processing entry data, performance of contract, generation of reports.

Legal basis for data processing: performance of contract, GDPR Article 6, Item (1)(b).

Scope of data processed:

Data related to registration: first and last name, phone number (optional, if the client offers it for receiving notices), e-mail address(es), name and city of the company, invoicing name and address.

Deadline for the deletion of data: 5 years on the conclusion of the training or conference, for eventual enforcement of claims.

Should a legal dispute ensue, the controller shall preserve the data till its conclusion, legal basis being the controller's legitimate interest, GDPR Article 6, Item (1)(f).

Eventual outcome of the non-provisioning of data: non-participation in the training or conference.

The controller may involve a data processor in the person of the organizer of the event with whom it may legally share data. The controller shall advise the data subjects of the person of the data processor; data processing activities by the data processor shall be the responsibility of the controller.

8. One-off information requests and meeting such requests

Purpose of data processing: answering questions.

Legal basis for data processing: freely given consent, GDPR Article 6, Item (1)(a).

Scope of data processed: e-mail address, the question posed and the answer given.

Deadline for the deletion of data: data shared shall be processed by the controller as long as use of the data is not prohibited by the user.

Eventual results of the non-provisioning of data: no answer is given.

9. Video and voice recording at events

Purpose of data processing: preservation and sharing of the materials of events.

Legal basis for data processing: legitimate interest of the controller, GDPR Article 6, Item (1)(f).

Scope of data processed: photo, video and sound recording.

Deadline for the deletion of data and duration of data processing: the controller is not obliged to delete such data as long as it has a vested interest in processing them, unless the data subject raises a lawful objection.

10. Data related to newsletters; distributing information about conferences and the magazine

Purpose of data processing: sending of newsletters, sharing information about conferences and publishing opportunities in the magazine.

Legal basis for data processing: freely given consent, GDPR Article 6, Item (1)(a).

Scope of data processed: name, e-mail address, phone number, name of company represented.

Deadline for the deletion of data: data shared will be processed by the controller as long as user unsubscribes from the newsletter or the e-mail address ceases to exist.

11. The controller will not check the personal data shared. The correctness of the data shared is the exclusive responsibility of the person to share such data. When sharing his or her e-mail address, the user warrants that the e-mail address shared is solely and exclusively used by him or her for correspondence. With regard to this responsibility, any entry into the registered space using that e-mail address shall be the responsibility of the user who registered the e-mail address. Should the user not register his or her own personal data, he or she shall be responsible for acquiring consent of the actual data subject.

12. Persons entitled to getting to know the personal data are the employees of the controller or persons working for it on basis of an engagement contract, and controller's top managers; in cases where the current Privacy Statement provides for the use of a data processor, the employees of the data processor or persons working for it on basis of an engagement contract, and the data processor's top managers.

IV. Transfer of data; data processors

1. By using the service, the user consents that the controller may transfer his or her data to the below partners.

2. The controller as the one to process the data is entitled and obliged to transfer all available and properly stored personal data to the relevant authorities in cases where it is obliged to effect such

transfer by precepts of law or an effective court order. The controller shall not be held responsible for such data transfer or its consequences.

3. If the current Privacy Statement makes the use of a data processor possible, the necessary data can be transferred to the processor.

4. Data transfer other than the ones specified in the present Privacy Statement shall only be effected as per the prior and informed consent of the user.

V. Storage of personal data; security of data processing

1. IT systems and other data retention locations of the controller are found at the controller's headquarters and at its data processors.

2. The controller shall select and operate the IT tools used for the processing of personal data during its service provisioning in a way that:

a) the data processed be accessible to authorized parties (availability);

b) their authenticity and authentication be guaranteed (authenticity of data processing);

c) the integrity of data be verifiable (data integrity);

d) the data be protected against unlawful access (data confidentiality).

3) The controller shall take the necessary measures to protect personal data, more specifically, against unlawful access, alteration, transfer, disclosure, deletion or destruction or accidental destruction, damage or cases when personal data become inaccessible due to a change in the technology used.

4. In order to protect the files processed electronically in its databases, the controller shall apply the necessary technical solutions so that the data stored shall not be directly combinable and associated with the user, unless permitted by law.

Combined data:

Names and e-mail addresses of participants at trainings and conferences.

Purpose of combination: To effect eventual discounts to regular visitors to events or to companies regularly delegating participants. The controller plans its future activities with knowledge of the fact of how many times, what trainings and events its former participants participated in.

5. With regard to the prevailing level of technical development, the controller shall provide for the protection of the security of data processing by technical, organisational and corporate measures that provide an adequate level of protection against risks arising on data processing.

6. During the course of its data processing, the data controller shall keep and preserve:

a) confidentiality: it shall protect information so that only authorized parties have access to it;

b) intactness: it shall protect the precision and completeness of information and of the method of processing;

c) availability: it shall provide for making the data available to the authorized user when he/she needs them and that all tools and means related to it shall be available.

7. The IT system and the network of the controller is protected against computer viruses. The operator provides for the security of the system by server and application level protection measures.

8. When defining and applying measures serving the security of data, the controller shall take the prevailing level of technical development into consideration. Of numerous data processing solutions, the one offering the highest level of protection to personal data shall be selected, unless it would require a disproportionate effort.

9. The controller provides for the protection of the security of data processing by way of technical, organisational and corporate measures that offer a level of protection proportionate to the risks

arising in connection with data processing.

10. Electronic messages transferred via the internet are vulnerable to network threats irrespective of the protocol used (e-mail, web, ftp, etc.) that may lead to unlawful activity or disclosure or alteration of the information. The controller shall take all reasonable measures to protect against such threats. It shall observe the systems so that it could record all security deviations and give proof in case of all breaches of data security. Systems observations can, at the same time, also make possible to check the efficiency of the protective measures applied. Nevertheless, as it is widely known – and users are also aware -, internet is not 100% safe. The controller shall not assume responsibility for eventual damages caused by unpreventable attacks that occurred even against the highest expected level of care.

VI. Rights of data subjects

1. The data subject shall have the right to obtain from the controller information about the processing of his or her personal data, the rectification of his or her personal data and the erasure of such data with exception of compliance with a legal obligation, the withdrawal of such data, and shall enjoy his or her right to data portability and right to object by using the method specified on registration or via the channels specified in Item 1., of the present Privacy Statement.

Changes in personal data or a request for the erasure of personal data shall be addressed to the controller in a written statement, by way of a fully conclusive private legal instrument sent to its e-mail address or by regular mail.

2. Right to information: The Controller shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The right to information can be exercised in writing, by using the channels specified in the present Data Protection Information. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

3. Right of access by the data subject: The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- the envisaged period for which the personal data will be stored;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- any available information as to their source.

A request for information received by e-mail shall only be considered authentic by the controller if it was sent from the registered e-mail address of the user, unless the user identifies himself/herself in another, credible way.

4. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards

5. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. On request of the data subject, the information shall be provided in an electronic form. The controller shall provide the information within one month on the receipt of the request the latest.

6. Right to rectification: The data subject shall have the right to obtain from the controller the rectification of inaccurate personal data concerning him or her and to have incomplete personal data completed.

If the personal data does not reflect reality and the real personal data are available at the controller, the personal data shall be rectified by the controller.

7. Right to erasure: The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent and where there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society service.

After complying with the request for the erasure or rectification of personal data, earlier (erased) data cannot be restored.

8. Erasure of personal data cannot be requested if data processing is necessary because of the following reasons: for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the establishment, exercise or defence of legal claims of controller.

9. Right to restriction of processing: The data subject shall have the right to request from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

10. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person. A data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.

11. Right to data portability: The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

12. Right to object: The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her by the controller or to their enforcing by the legitimate interests of third parties, including profiling based on those provisions. In case of objection, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

13. Right of withdrawal: The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

14. Procedural modalities: The controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means, unless otherwise requested by the data subject.

15. If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

16. Information provided and any communication shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request.

17. The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

18. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject the information shall be provided in an electronic form.

19. Right to compensation for damages and compensation: Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. The processor shall be liable for the damage caused by processing only where it has not complied with obligations of this Regulation specifically directed to processors or where it has acted outside or contrary to lawful instructions of the controller. Where more than one controller or processor, or both the controller and the processor, are involved in the same processing, each controller or processor shall be held

liable for the entire damage. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

VII. Legal remedies:

1. Right to litigate: The data subject may turn to court in case of a breach of his or his rights. The court will handle such cases with priority.
2. Procedure before the data protection authority: Complaints shall be addressed to the Hungarian National Authority for Data Protection and Freedom of Information
Name: Hungarian National Authority for Data Protection and Freedom of Information
Seat: 22/C Szilágyi Erzsébet fasor, 1125 Budapest, Hungary
Mailing address: Pf.: 5., 1530 Budapest, Hungary
Phone: +36.1.391.1400
Fax: +36.1.391.1410
E-mail: ugyfelszolgalat@naih.hu

VIII. Definitions Applied in the present Privacy Statement

1. personal data: 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
2. processing: 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. restriction of processing: 'restriction of processing' means the marking of stored personal data with the aim of limiting their processing in the future;
4. controller: 'controller' means the legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data;
5. processor: 'processor' means a legal person which processes personal data on behalf of the controller;
6. recipient: 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.
7. third party: 'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
8. consent of the data subject: 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
9. data processing (technical): performance of technical procedures required to data processing irrespective of the method or tool applied or the venue of processing provided that the processing of data is actually performed;

10. right to erasure: making personal data unrecognizable in a way that their reconstruction is made impossible;
11. EEA state: any member state of the European Union and any other state party to the agreement on the European Economic Area further, any other non-signatory state citizens of which enjoy a legal status identical to that of the citizens of the signatories of the European Economic Area agreement on basis of an international treaty concluded between the European Union and its member states and the non-signatory state;
12. data subject: any specific natural person identified by personal data or who can be directly or indirectly identified by personal data;
13. user: any natural person who registers on the controller's homepage or buys there without registration;
14. third country: any non-EEA member state;
15. disclosure of data: making personal data accessible to any other person.