

Internal Data Protection Policy

Budai Mozgásfejlesztő Központ

Introduction

The Budai Mozgásfejlesztő Központ (hereinafter referred to as: Service Provider or Data Controller) adopts the following internal data protection policy in order to document its internal data management processes and ensure the rights of data subjects, in compliance with Regulation (EU) 2016/679 (GDPR).

Service Provider and Data Controller

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Purpose of the Policy

The purpose of this policy is to ensure that data subjects receive proper information under GDPR Article 13

regarding data handled by the Service Provider or its data processors. This includes information about sources, purposes, legal bases, duration, data processors, and potential data transfers.

Definitions

Personal data, data processing, data controller, data processor, recipient, consent, and data breach are all defined in alignment with GDPR terminology.

Principles of Data Processing

Data must be processed lawfully, fairly, and transparently, collected for specific, legitimate purposes, and limited to what is necessary. Storage duration must be limited, and processing requires informed consent.

Data must be securely managed and only accessible to authorized personnel.

Principles for Handling Personal Data

Online identifiers like IP addresses and cookies may be combined with other data to profile individuals.

Children's data require special protection. Inaccurate data must be corrected, and access must be protected.

Data Processing Activities

Covers data collected through participation in trainings and events. Data processed includes name, contact info, health details, and guardianship for minors. Consent is required and can be withdrawn at any time.

Data Processing for Billing and Support Confirmations

Invoicing and donor confirmations require name, address, tax number, and payment method. Legal obligations govern retention, and consent can be withdrawn unless overridden by statutory requirements.

Authorized Data Processors

Hosting is managed by Aikido Kids Ifjúsági és Szabadidő-sport Egyesület. Data is stored on a secure virtual server. Access is limited to authorized staff and is governed by data protection requirements.

Lawfulness of Data Processing

Data must be processed on a lawful basis: consent, contract, legal obligation, or legitimate interest. Processing must be reasonable, expected, and aligned with original purposes unless clearly compatible.

Consent of the Data Subject – Conditions

The controller must prove consent was given. Consent can be withdrawn at any time and must be easy to revoke.

Children under 18 require parental consent for lawful data processing.

Information and Rights of the Data Subject

The principle of fair and transparent processing requires that data subjects be informed of the processing and its purposes.

They have the right to access, rectify, erase, restrict processing, or object.

Review of Personal Data

To ensure that personal data are stored only as long as necessary, the organization's standard review period is 5 years.

Responsibilities of the Controller

The controller must implement effective measures and document compliance with applicable laws. These include securing data, training staff, and maintaining transparency.

Data Subject Rights Regarding Data Processing

Right to information: the right to be informed about what, why, and how data are processed.

Right to rectification: the right to have inaccurate data corrected.

Right to erasure: also known as the “right to be forgotten.”

Right to restriction of processing: limits the way data is used.

Right to object: to data processing for specific reasons, including profiling.

Remedies and Complaint Procedures

Complaints can be filed with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

Address: H–1125 Budapest, Szilágyi Erzsébet fasor 22/c

Mail: H–1530 Budapest, P.O. Box 5

Phone: +36 1 391 1400

Email: ugyfelszolgalat@naih.hu

Website: <https://naih.hu>

Legal proceedings may also be initiated by the data subject.

Organizational Responsibilities

The Service Provider must inform data subjects, establish clear rules, and provide accessible forms for exercising their rights.

All requests must be handled within 30 days (extendable to 90 days with justification).

Data Security

Data must be protected against unauthorized access, alteration, transmission, disclosure, loss, destruction, or damage.

Electronic systems must be adequately secured.

Legal Basis

GDPR (Regulation EU 2016/679)

Hungarian Act CXII of 2011 on informational self-determination

Act LXVI of 1995 on public archives

Government Decree 335/2005 (XII.29.)

Act CVIII of 2001 on electronic commerce

Act C of 2003 on electronic communications