

2024 EUROPEAN CHAMPIONSHIPS IN RHYTHMIC GYMNASTICS

PRIVACY POLICY

TARTALOMJEGYZÉK

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1. INTRODUCTION

- 1.1. The 2024 European Rhythmic Gymnastics Championships ("**European Championships**") will be held in Hungary. The European Championships will be organised by the **Nemzeti Rendezvényszervező Ügynökség Nonprofit Zrt** (registered office: 1054 Budapest, Garibaldi utca 2, company registration number: 01-10-142172) ("**NRÜ**") as public service organisation responsible for sport events, in cooperation with the **Hungarian Gymnastics Federation** (registered office: 1146 Budapest, Istvánmezei út 1-3., registration number: 01-07-0000040) ("**MATSZ**") as host federation, and the **Hungarian Rhythmic Gymnastics Federation** (registered office: 1146 Budapest, Istvánmezei út 1-3., registration sub-number: 40/14) ("**MGRSZ**") as local organising committee.
- 1.2. For the organisation of the European Championships, the NRÜ, the MATSZ and the MGRSZ (collectively the "**Data Controller**"), acting as joint data controllers, shall process the personal data of the members of the teams participating in the European Championships and of the persons registering on behalf of the teams and team members ("**Data Subjects**") on the website www.rg2024.eu/en/registration ("**Website**"). The joint controllers entered into an agreement in accordance with Article 26 of the GDPR to manage the obligations regarding data processing, under which the NRÜ is responsible for providing information on data processings.
- 1.3. The purpose of this Privacy Policy (hereinafter referred to as the "**Policy**") is to inform Data Subjects about the key aspects of personal data processing.

2. GENERAL INFORMATION

- 2.1. The Data Controller is committed to the protection of the Data Subject's personal data and particularly wishes to observe the Data Subject's fundamental right to informational self-determination. The Data Controller treats the Data Subject's personal data confidentially, and undertakes all necessary security, technical and organisational measures to ensure the security of the data.
- 2.2. The Data Controller processes the Personal Data of the Data Subjects exclusively in Hungary and does not transfer it to persons other than those data processors specified in this Policy.
- 2.3. The Data Controller:
 - processes the personal data lawfully, fairly and in a transparent manner in relation to the data subject ('**lawfulness, fairness and transparency**');
 - collects personal data for specified, explicit and legitimate purposes and does not further process the personal data in a manner that is incompatible with those purposes ('**purpose limitation**');
 - processes personal data that are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('**data minimisation**');
 - processes accurate and up to date personal data ('**accuracy**');
 - keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('**storage limitation**');
 - processes the personal data in a manner that ensures appropriate security of the personal data ('**integrity and confidentiality**').
- 2.4. Data Controller's data processing principles are in harmony with the relevant data protection regulations as effective, including but not limited to the following:

- The Constitution of Hungary (**Freedom and Responsibility, Article VI**).
 - 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 – “**GDPR**”);
 - Act No. CXII of 2011 on the right to informational self-determination and on informational freedom (“**Info Act**”);
 - Act No. V of 2013 on the Civil Code.
- 2.5. This Privacy Policy and information related to the Data Controller’s data processing are always available on the Website. The Data Controller retains the right to amend the Policy, in which case it will provide information in accordance with the legislation in force.
- 2.6. Should you have any question regarding the Privacy Policy or the Data Controller’s data processing, please contact our colleague on the info@nruevent.hu email address.

3. DATA PROCESSING

- 3.1. The Data Controller strives to limit its personal data processing activity to what is absolutely necessary. The Data Controller processes the following personal data provided on the Website for the purposes and on the legal basis detailed below:

3.1.1.Registration on the Website

- *Purpose of the data processing:* To provide a registration interface (Website) to the representative of the teams.
- *Personal data processed:* Name, federation, country, telephone number, email address, registration number.
- *Source of data:* The person registering on the Website.
- *Legal basis for processing:* The processing is necessary for the organisation of the event, i.e. for the performance of a public service (Article 6(e) GDPR).
- *Duration of processing:* The Data Controller processes the data until the seventh day following the last day of the European Championship.

3.1.2.Registration of team members

- *Purpose of data processing:* To ensure the registration of team members for the European Championship.
- *Personal data processed:* First name, surname, third name, date of birth, gender, function, citizenship, passport number, passport expiry date, arrival and departure date, photo, practice track.
- *Source of data:* The person registering on the Website.
- *Legal basis for processing:* The processing is necessary for the organisation of the event, i.e. for the performance of a public service (Article 6(e) GDPR).
- *Duration of processing:* The Data Controller processes the data until the seventh day following the last day of the European Championship.

3.1.3.Supporting visa request

- *Purpose of the processing:* Issuance of a letter of support to the Data Subjects for the purpose of visa processing.
- *Personal data processed:* First name, surname, date of birth, nationality, passport number, passport expiry date.
- *Source of data:* The person registering on the Website.

- *Legal basis for processing:* The processing is necessary for the organisation of the event, i.e. for the performance of a public service (Article 6(e) GDPR).
- *Duration of processing:* The Data Controller processes the data until the seventh day following the last day of the European Championship.

3.1.4. Travel

- *Purpose of processing:* Provision of transfers for Data Subjects during the European Championship.
- *Personal data processed:* Number of packages, travel method, arrival time, departure time.
- *Source of data:* The person registering on the Website.
- *Legal basis for processing:* The processing is necessary for the organisation of the event, i.e. for the performance of a public service (Article 6(e) GDPR).
- *Duration of processing:* The Data Controller processes the data until the seventh day following the last day of the European Championship.

3.1.5. Accommodation

- *Purpose of processing:* Arranging accommodation reservations for the Data Subjects for the duration of the European Championship.
- *Personal data processed:* Hotel designation, room type, arrival, and departure date.
- *Source of data:* The person registering on the Website.
- *Legal basis for processing:* The processing is necessary for the organisation of the event, i.e. for the performance of a public service (Article 6(e) GDPR).
- *Duration of processing:* The Data Controller processes the data until the seventh day following the last day of the European Championship.

3.1.6. Catering

- *Purpose of the processing:* providing meals tailored to the needs of the Data Subjects during the European Championship.
- *Personal data processed:* number of meals for given days, food allergies.
- *Source of data:* The person registering on the Website.
- *Legal basis for processing:* The processing is necessary for the organisation of the event, i.e. for the performance of a public service (Article 6(e) GDPR).
- *Duration of processing:* The Data Controller processes the data until the seventh day following the last day of the European Championship.

4. OTHER DATA PROCESSING

- 4.1. The Data Controller may occasionally perform other personal data processing. Information about any data processing not mentioned in this Privacy Policy will be supplied on the data collection.
- 4.2. The Data Subject is informed that the court, the public prosecutor, the criminal investigation authority, the infringements authority, the public administration authority, the National Data Protection and Informational Freedom Authority (“**NAIH**”), as well as other authorities authorized by legal regulation may request information, data and documents from the Data Controller, who will grant such requests to the extent it is required by the relevant legal regulations. The Data Controller will disclose personal data to the authorities only to the extent it is indispensable for the fulfilment of the authorities’ meticulously detailed request for information as regards the scope and purpose of information.

5. DATA PROCESSORS

5.1. The Data Controller assigns the following data processors during its data processing activity:

- **Lounge Event Korlátolt Felelősségű Társaság** (registered office: 1022 Budapest, Tövis utca 10.; company registration number: 01-09-329216) - The service provider assists the Data Controller in the organisation of the event.
- **COMPOFFICE-R Korlátolt Felelősségű Társaság** (registered office: 2030 Érd, Festő utca 93.; company registration number: 13-09-096805) - Responsible for the structure and operation of the Website and the registration platform thereon.

6. PROCESSING OF THIRD PARTIES' DATA

6.1. Given that the person registering on the Website registers the team members and provides their personal data, the person registering on the Website is obliged to obtain the consent of the team members in advance or to comply with other legal basis conditions. By submitting personal data of team members, the person registering on the Website declares that he/she has the legal capacity and authority to submit the personal data and that he/she will communicate this Privacy Policy to the Data Subjects to whom he/she has submitted personal data.

7. DATA SECURITY

7.1. The Data Controller treats the Data Subject's personal data confidentially, therefore Data Controller has adopted the technical and organizational measures necessary to ensure the security of personal data and avoid their accidental or unlawful destruction, loss, alteration, processing or unauthorized access, given the state of the technology, the nature of the stored data and the risks to which they are exposed, whether they come from human action or from the physical or natural environment. The Data Controller selects and operates the IT equipment used to process personal data with respect to the contractual relationship in such a way that the processed data:

- (a) is available to authorized persons (availability);
- (b) authenticity and authentication are ensured (authenticity of data processing);
- (c) integrity can be proven (integrity of data); and
- (d) is protected against unauthorized access (confidentiality of data).

7.2. The Data Controller shall take appropriate measures to protect the data, in particular against unauthorised access, alteration, disclosure, publication, deletion or destruction, accidental destruction, damage and loss of access due to changes in the technology used.

8. RIGHTS AND REMEDIES

8.1. The Data Subject has a right to:

- **access the personal data:** Upon the Data Subject's request, the Data Controller supplies information about the Data Subject's data processed by the Data Controller as data controller and/or processed by a data processor on the Data Controller's behalf if any of the conditions stipulated in Article 15 of GDPR is fulfilled.
- **request the rectification of the personal data:** The Data Controller rectifies the Data Subject's personal data if such data is inaccurate or incomplete while the correct personal data is available to the Data Controller.
- **request the erasure of the personal data (right to be forgotten):** The Data Controller erases any and all personal data if any of the conditions stipulated in Article 17 of GDPR is fulfilled.

- **restriction of processing:** The Data Subject obtains from the Data Controller the limitation of the data processing if any of the conditions stipulated in Article 18 of GDPR is fulfilled.
 - **data portability:** The Data Subject receives the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format, if the processing is based on a consent or contract and it is carried out by automated means.
- 8.2. The Data Controller provides information on action taken on the Data Subject's request sent to the contract person specified in Section 2.6. 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, considering the complexity and number of the requests. The Data Controller informs 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 means, the information will be provided by electronic means where possible, unless otherwise requested by the Data Subject. If the Data Controller does not act on the Data Subject's request, the Data Controller will 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.
- 8.3. Data Subject's right to remedy:
- **filing a complaint with the authority:** Without prejudice to any other administrative or judicial remedy, Data Subject may, in the event of an infringement of his or her rights, file a complaint with the data protection authority (**Nemzeti Adatvédelmi és Információszabadság Hatóság**; address: H-1055 Budapest, Falk Miksa utca 9-11.; Tel.: +36 1 391 1400, Fax: +36 1 391 1410, email: ugyfelszolgalat@naih.hu; website: <http://naih.hu>).
 - **filing a complaint with the court:** Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, Data Subjects have the right to an effective judicial remedy where he or she considers that his or her rights have been infringed as a result of the processing of his or her personal data in non-compliance with the data protection regulation. The Data Controller is liable for any loss or damage caused by the unlawful processing of the Data Subject's data or by any violation of applicable data-security requirements. The Data Controller will be exempted from such liability if the loss or damage was caused by circumstances beyond its control and outside the scope of data processing. No compensation shall be paid to the extent that the loss or damage was caused by the Data Subject's wilful or grossly negligent conduct.