



SOVEREIGN MILITARY HOSPITALLER ORDER
OF ST. JOHN OF JERUSALEM OF RHODES AND OF MALTA

HUNGARIAN ASSOCIATION

INFORMATION ON DATA MANAGEMENT

I. Introduction.

The Hungarian Association of the Order of Malta (MMLSZ) (registered seat : H-1014 Budapest, Fortuna utca no. 10, taxpayer no. 18083385-1-41; company registration no.: 01-02-0007077, registered: Metropolitan Court: 0100/Pk.60240/1996; bank account no. 10700024 - 04123505 -51100005; IBAN: HU49 1070 0024 0412 3505 5110 0005; BIC (SWIFT) CIBHHUHB; Euro account: 10700024 -04123505 - 50200009; Tel: 00 36 30373 8054; www.mmlsz.hu; e-mail: mmlsz@maltai.hu), is committed to ensure the protection of personal data. As data manager, it considers itself bound by the contents of the present prospectus and commits itself to undertake all data management related to its activities in accordance with this prospectus and the requirements set out in current legislation.

The Hungarian Association of the Order of Malta is a « Designated organisation » as per the Cooperation Agreement between the Government of the Republic of Hungary and the Sovereign Hospitaller Order of St. John of Jerusalem, of Rhodes and of Malta (Promulgated under section 1 (b) of Act CXL of 2010).

The data management principles of the Hungarian Association of the Order of Malta are in accordance with existing national legislation on data protection, in particular:

- Act CXII (2011) on the Right to Self - Determination and on freedom of information (hereafter referred to as: Info tv.)
- Act V (2013) on the Civil Code (Ptk.)
- Act CLV (1997) on Consumer Protection (Fgytv.)
- Act C (2000) on Accounting (Sztv.)
- Act CVIII (2001) on Electronic Commerce Services as well as on certain issues related to information society services (Eker tv.)
- Act XLVIII (2008) on the basic conditions of economic advertising and on certain limits (Grt.)
- Government Decree 393/2013. (XI. 12.)
- Act CXL (2010) Article 1 (b)

In the field of data protection, the Hungarian Association of the Order of Malta conforms itself in all circumstances, during data processing, to the provisions of (General Data Protection Regulation) 2016/679 of the European Parliament and Council on the protection of individuals



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regarding the management of personal data and on the free movement of such data, repealing Regulation (EC) No 95/46.

This document provides information about the management of your personal data, and your rights in relation to it, in accordance with European Union and national law.

II. Data manager.

Your data are managed by the **Hungarian Association of the Order of Malta**.

Hungarian Association of the Order of Malta (MMLSZ)

H-1014 Budapest, Fortuna utca no. 10,

taxpayer no. 18083385-1-41;

company registration no.: 01-02-0007077,

Bank account no. 10700024 -04123505 -51100005

IBAN: HU49 1070 0024 0412 3505 5110 0005

BIC (SWIFT) CIBHHUHB

Euro account: 10700024 -04123505 - 50200009;

IBAN: HU83 1070 0024 0412 3505 5020 0009

BIC (SWIFT) CIBHHUHB

Tel: 00 36 30373 8054; www.mmlsz.hu; e-mail: mmlsz@maltai.hu

Name of the court of registration: Metropolitan Court 0100 / Pk.60240 / 1996

III. Data Protection Officer

You can contact the Data Protection Officer at any time at the contact details below:

Hungarian Association of the Order of Malta (MMLSZ)

H-1014 Budapest, Fortuna utca 10.

Chancellery - the current Chancellor

phone: 00 36 30373 8054

e-mail address: mmlsz@maltai.hu

IV. Scope of data managed, purpose, legal basis, and duration

All data provided to the **Hungarian Association of the Order of Malta** is voluntary.



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The **Hungarian Association of the Order of Malta** collects data exclusively for purposes of organizational and personal contact and to the extent necessary for that purpose, and such data shall only exceptionally fall under the definition of personal data. Organizational communication the provision of data other than for purposes of organisational contact-keeping is entirely voluntary, and it is the responsibility of the owner of the personal data. The **Hungarian Association of the Order of Malta** shall do everything in its power to ensure the security of personal data that comes to its knowledge, to protect them from unauthorized access, public disclosure, deletion, or destruction. The **Hungarian Association of the Order of Malta** does not provide any information on personal data to third parties, except for formal inquiries based on law.

At any time, the version of the "Information on Data Management" displayed on the MMLSZ website shall be deemed to be the version in force.

We draw attention to the fact that, if you do not provide the personal information necessary for a particular service, you will not be able to use that service.

1. Data managed at the establishment of a customer relationship, and during its existence

1.1 Membership of the Hungarian Association of the Order of Malta

Scope of the managed data: member's name, address, e-mail address, telephone number, date of birth, signature,

Civil registry data, other statements.

Legal basis of data management: data management required for inclusion in the Order (Section 6 (4) of the Information Act paragraph).

The scope of records to be kept on members of the Association shall be established by the Council. They shall be kept by the Chancellor. The personal data of the members of the Association are not public. (Reference: § 3:67 of the Civil Code).

Personal data is stored in a multi-password protected location. Members of the Association can access each other's names, contact details, class, grade, and position in the Order, on an internal IT interface protected with username and password. They are prohibited from divulging these to any person outside the Association.

The purpose of data management: admission process into the Order; selection and authorization of appropriate and efficient communication channels.

Duration: until the withdrawal of participant's consent. In the case of specific channels of communication, we handle the data until the withdrawal of relevant consent.



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Forwarding of data: to the **Sovereign Military Hospitaller Order of St John of Jerusalem of Rhodes and of Malta**, Magistral Palace, Via Condotti, 68 Rome; Phone +39.06.67581.1; info@orderofmalta.int

Legal basis for data forwarding: Constitutional Charter and Code of the Order

Data processing: is archived and stored by Hungarian Association of the Order of Malta H-1014 Budapest, Fortuna utca 10. Tax number: 18083383-1-41; Registration number: 01-02-0007077; Bank account number: 10700024 -04123505 -51100005; Tel: 00 36 30373 8054; www.mmlsz.hu; e-mail: mmlsz@maltai.hu)

Method of data provision: voluntary.

1.2 Supplier Contact Details

Managed data: company name, e-mail address, telephone number, tax number, account number

Legal basis of data management: contract (Section 6 (4) of the Information Act,

Purpose of data management: Contact with suppliers

Duration of data management: data stored for 5 years after the end of the business relationship with the supplier.

Data transfer: does not occur.

Financial transfers are made by the Hungarian Association of the Order of Malta.

Legal basis for data transmission: Info tv. Pursuant to Section 8 (1) (b)

Data processing: Hungarian Association of the Order of Malta, H-1014 Budapest, Fortuna utca 10.

Method of data provision: voluntary

1.3 Accidents involving program Participants, Guests, Other Customers

Data managed: name, address, e-mail address, telephone number, date, time, place of accident, brief description of the incident, information on medical care, details of any witnesses (name, title)

Legal basis for data management: voluntary consent (Section 5 (1) (a) of the Information Act point)

Purpose: documentation of accident occurred on property of, or at an external venue organised by, the Hungarian Association of the Order of Malta, H-1014 Budapest, Fortuna utca 10.

Duration of data management: for five (5) years, Civil Code. 6:22. §

Data manager: Hungarian Association of the Order of Malta H-1014 Budapest, Fortuna utca 10.

Method of data provision: voluntary

Data transmission: Health care institution or other authority if necessary.



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1.4 Protection of the property of the Hungarian Association of the Order of Malta: camera system, entry authorization card.

Data managed: facial image and other personal data; information required for issuing the individual access card.

Legal basis for data management: voluntary consent (Section 5 (1) (a) of CXXXIII of 2005 Section 30 of the

Information Act) (rules on protection of individuals and property, and on the conduct of private investigations).

Purpose of data management: protect human life, physical integrity and property, prevention and detection of infringements, identification of the perpetrator and infringement, identification of those entering the territory of the Hungarian Association of the Order of Malta, recording of entry, documenting activities of the unauthorized persons, investigation of any accidents.

Duration of data management: default 8 months for camera recording; access cards data recording is of unlimited duration.

Data manager: the Hungarian Association of the Order of Malta H-1014 Budapest, Fortuna utca 10.

Tax number: 18083383-1-41; Registration number: 01-02-0007077; Bank account number: 10700024 -

04123505 -51100005; Tel: 00 36 30373 8054; www.mmlsz.hu; e-mail: mmlsz@maltai.hu).

Persons entitled to view the images of the cameras: authorised officials of the the Hungarian Association of the Order of Malta, and relevant investigating authorities.

Persons entitled to record the images of the cameras on a data carrier: the Hungarian Association of the Order of Malta.

Rights of natural persons recorded by the camera: Those concerned may request information about themselves,

make a copy of the recording, or request that the recording be deleted.

Transmission of data: to authorities or court of law, conducting infringement or criminal proceedings.

Legal basis for the transfer of data: Act XC of 2017 on Criminal Procedure Act § 261-265, 309 Par. (1), § 315-317, on infringements, and infringement proceedings; and Act II (2012) on registration systems Section 75 (1) (a) and Section 78 (3).

Data processor: none

Method of data provision: voluntary

Information board: *We would like to inform our dear guests that cameras have been placed in the on the property of the Hungarian association of the Order of Malta.*



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2. On-line activity

2.1 Applying to programs via Internet

Data managed: name, address, e-mail address, telephone number, date of birth, tax number / tax ID,

identity document number, account number, nationality, health certificates, if necessary, documents.

Legal basis for data management: voluntary consent (Section 5 (1) (a) of the Information Act)

Purpose of data management: to announce the intention to participate in a program. This requires

establishing the contact, selecting and enabling individual communication channels, if necessary, through service intermediaries.

Duration of data management: Participant data shall be kept until his or her consent is withdrawn, or for five years after use. Invoices are kept for 8 years, in accordance with Section 169 (2) of Act C of 2000 on accounting. We manage contact details for each communication channel until consent is withdrawn.

Data Transfer: Exclusively to intermediary organization, health care institutions or investigative authorities.

Legal basis for data transmission: Pursuant to Section 8 (1) (b) 5 of Information Act.

Method of data provision: voluntary

Data processing: not done.

2.2 Use of the "mmlsz.hu" website

Data managed: date, time of use of the website, user device and browser information, IP address of the user's computer, geographical location.

The internal pages of the website are protected by a password and a username, only those authorized to do so can enter.

Legal basis for data management: Voluntary consent (Section 5 (1) a) of the Information Act.

Purpose of data management: to monitor the data of the visitors to the website, ensuring its operation and preventing abuse.

Duration of data management: we do not store geographical location, IP, browser data.

Data transfer: The website is operated by the Hungarian Association of the Order of Malta.

Website manager: Halation Kft. Wwww.halation.hu Cseszkó Ferenc +36 20 9402726.

The data is stored by the host provider: Compose-IT Kft Compose-IT Kft. Wwww.composeit.hu Gergely Medgyesi +36 30 5255089

Legal basis for data transmission: Section 8 (1) (b) of the Information Act.

Data processor: none

Method of data provision: optional



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2.3 Handling of the "mmlsz.hu" cookie

Managed data: -

Legal basis for data management: -

Purpose of data management: The website does not currently contain cookies!

Duration of data management: -

Data transmission: -

Legal basis for data transfer: -

Data processor: none

Method of data provision: -

2.4 WIFI service

Managed data: The Service Provider does not record or process any data regarding the identity of the user during the latter's use of the network.

The Service Provider monitors the network to ensure the proper quality, uninterrupted and lawful use of the network. In this context, certain data regarding the device used by the User for network connection, is automatically recorded to ensure a better experience and efficient source of information, facilitate use, control the operation of the network, prevent abuses, and ensure the smooth and efficient operation of the network to an adequate standard.

To use the WIFI network, an access ID and password are needed, these are provided by officials.

Recorded data:

- device identifiers e.g. IP address and MAC address, and the name of the device, which may refer to the user

- type, date and duration of connection to the network.

Legal basis for data management processing: Voluntary consent (Section 5 (1) a) of the Information Act)

Purpose of data management: ensuring free WIFI access on the premises of the Hungarian Association of the Order of Malta.

Duration of data management: 6 months after use by the data subject.

Data transfer: does not occur

Data processing: VárTelekom Kft., 1119 Budapest, Andor u. 47-49.

Method of data provision: optional

2.5 Recording Phone Calls

Managed data: name, address, e-mail address, telephone number of service user; if relevant, statement of complaint, record of objection, service, request for information.

Legal basis for data management: Voluntary consent (Section 5 (1) a) of the Information Act); in the case of a complaint made by an end consumer, the CLV of 1997 on consumer protection.

Act 17 / A. § (7)



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Purpose of data management: investigation and fulfilment of requests and complaints made in telephone calls to the Hungarian Association of the Order of Malta.

Duration of data management: until caller's consent is withdrawn, or up to 1 year. Invoices are kept for 8 years, in accordance with Section 169 (2) of Act C of 2000 on Accounting

Data transmission: none

Legal basis for data transmission: Info tv. Pursuant to Section 8 (1) (b)

Data processor: none

Method of data provision: voluntary

There is no information text for an incoming call, electronic records of conversations are not kept, they are only recorded on paper and, if necessary, the message / remark / complaint / request is forwarded to the addressee by e-mail or telephone, if the customer could not talk directly to the called party.

2.6 Applying for a job advertised by the Association of Hungarian Knights of Malta

Data managed: name, address, e-mail address, telephone number, place of birth, time, mother's maiden

name, gender, tax ID, education, professional experience, resume, motivational and other information provided in the application.

Legal basis for data management: Voluntary consent (Section 5 (1) a) of the Information Act).

Purpose of the data management: application, participation in the selection process for a job announced by the Hungarian Association of the Order of Malta.

Applicants can apply through several channels:

- in person with CV submitted to the Hungarian Association of the Order of Malta,
- via e-mail via the Internet
- by applying to headhunter companies
- by mail.

Duration of data management: Until the consent of the data subject is withdrawn, or maximum one year from receipt of the hardcopy CV or from uploading, resp. updating it electronically. If the applicant is eventually admitted, thereafter the provisions of labor law shall prevail.

Transmission of data: **to the authorities required to report employment.**

Legal basis for data transmission: Info tv. Pursuant to Section 8 (1) (b)

V. Legal Remedies

You may contact the Data Protection Officer mentioned above at any time in order to exercise the following rights:

- Right to information about data management and data processed, and/or request copies (Article 15 GDPR on data access, Information Act § 15),
- Right to request a correction of or incomplete data,
(Right to rectification Article 16 of the GDPR, Information Act § 17)



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- Right to request the deletion of your personal data; if your personal information data has been made public, to request us to pass on your request for deletion to other data managers (Right to cancel Article 17 of the GDPR, § 17 (2) of the Information Act),
- Right to request a restriction on data management (right to restrict data management under Article 18 of the GDPR, Info Act.),
- Right to obtain your personal data in a structured, generally used and machine-readable form, and request the transfer of this data to another manager (right to data portability Article 20 GDPR),
- Right to object to management of your data (right to object GDPR Article 21, Info Act § 21),
- Right to withdraw your consent in the case of data management based on your previous consent. Such

withdrawal of consent does not affect the lawfulness of data processing in the preceding period. (Right to withdraw consent, Article 7 (3) GDPR).

- Right to lodge a complaint with the supervisory authority if you consider that data management was

contrary to any law. (Right to complain to the supervisory authority, GDPR Article 77)

The data subject may request information on the management of his or her personal data as well as rectification or erasure of such data, except for mandatory data management, in the manner indicated during data collection, as well as through the contact address of the Hungarian Association of the Order of Malta.

a.) information:

At the request of the data subject, the Hungarian Association of the Order of Malta shall provide information on the scope of data managed, the purpose of the data management, the legal basis, the duration, the name, address and data management activities of the data manager, the circumstances of the data protection incident and the measures taken to deal with it, and, in the event of a transfer, its

legal basis and addressee. The data manager shall provide said information in the shortest time possible from the submission of the request, but not more than 25 days, in an intelligible form, in writing. This information is free of charge if the person requesting the information has not already submitted, within the current year, another request for information to the data manager concerning the same dataset.

b.) correction:

The data subject may request the rectification of his / her personal data if they are incorrect and if the correct personal data is made available to the data manager.

c.) blocked data:



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The **Hungarian Association of the Order of Malta** may block information, at the request of the data subject, or if, based on the information available to it, it can assume that the deletion of the data would harm the legitimate interests of the person concerned. Blocked personal data may only be kept for as long as there is a data management purpose that precludes the deletion of such personal data.

d.) deleting data:

The **Hungarian Association of the Order of Malta** will delete personal data if:

- its management is unlawful,
- the data subject so requests,
- the statutory deadline for the storage of data has expired,
- it is ordered by a court or the National Data Protection and Freedom of Information Authority.

The data manager has 25 days to delete, block or correct personal data available to it. If he does not comply with his request, he shall state the reasons for the rejection in writing within 25 days.

e.) Objection to against the management of personal data:

The data subject may object to the management of his or her personal data if

- the management or transfer of personal data is necessary solely to fulfil the legal obligations of the data manager, or to enforce a legitimate interest of the data manager or a recipient third party, unless the processing is required by law;
- the use or transfer of personal data is for the purpose of direct business acquisition, public opinion research or scientific research;
- in other cases, specified by law.

The **Hungarian Association of the Order of Malta** shall examine the objection, take a decision on the matter, and inform the applicant in writing of its decision, as soon as possible, but not later than 15 days after receipt of the objection. If the data manager establishes that the objection is grounded, it shall terminate both the recording and transmission of data, it shall block the data, and it shall notify all persons to whom the personal data concerned by the objection have previously been transmitted, who are obliged to act to enforce the objection.

If the data manager does not respond to the request, or the data subject does not agree with the decision taken, the latter may take legal action within 30 days of the communication, or of the missed deadline.

If the data subject's rights are violated, he or she may take legal action against the data manager. The district court has jurisdiction. At the choice of the plaintiff, the action may be taken at his or her place of domicile or permanent residence. The court shall act on a basis of urgency. If the data manager, by unlawful processing of data or by violating the requirements of data security, causes damage to another, he is obliged to compensate it. If the data manager's unlawful processing of the data subject's data, or a breach of the data, infringe the data subject's right to



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privacy, the data subject may claim damages. The data manager is liable to the data subject also for damage caused by the data processor. The data manager is released from liability in case of damage due to unavoidable cause. The data manager will not reimburse any damage resulting from intentional or grossly negligent conduct on the part of the affected person.

VI. Definitions

1. data subject: natural person directly or indirectly identified or identifiable on the basis of any specific personal data;
2. personal data: data which can be associated with the data subject, in particular name of the data subject, personal identification data, facts related to characteristics, and conclusions drawn therefrom on the data subject;
3. Consent: voluntary and firm expression of the data subject's wish, based on adequate information and representing unambiguous consent to the processing of personal data, whether in full or in part;
4. objection: a statement by the data subject objecting to the processing of his or her personal data, and requesting the termination of data processing or the deletion of processed data;
5. data manager: a natural or legal person, or an association without legal personality, which, alone or in association with others, is responsible for processing data, takes decisions on data management (including the means used) and executes them, or entrusts a data processor to execute them;
6. data management: any operation on data, regardless of the procedure used, or the sum total of such operations, in particular collection, recording, systematisation, storage, modification, use, retrieval, transmission, publication, harmonization or interconnection, blocking, erasure and destruction, prevention of its further use; recording of photographs, sound or images of physical characteristics of the person (e.g. fingerprints or palm prints, DNA sample, iris image);
7. data transfer: making the data available to a specified third party;
8. Publication: making the data available to anyone;
9. Data erasure: making data unrecognizable so that it can no longer be recovered;
10. data labeling: marking the data to make it identifiable;
11. data blocking: labeling data in order to limit its management, temporarily or permanently;
12. destruction of data: total physical destruction of a data medium;
13. data processing: performance of technical tasks related to data management, regardless of the method and means used to carry out the operations, and from the place of application, provided that the technical task is performed on the data;
14. data processor: that natural or legal person, or association without legal personality, which, under its contract with the data controller - including contracts based on the basis of a provision of law - processes the data;
15. data set: the totality of the data managed in one register;



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16. third party: a natural or legal person, or association without legal personality, which is not the data subject, the controller nor the data processor;
17. EEA State: a Member State of the European Union, another State party to the Agreement on the European Economic Area, as well as any State enjoying the same status, under an international agreement, as nationals of the European Union and its Member States and States parties to the Agreement on the European Economic Area;
18. third country: any State that is not an EEA State;
19. data protection incident: unlawful handling or processing of personal data, in particular unauthorized access, alteration, transmission, publication, deletion or destruction, and accidental destruction and damage.

Complaints and requests for legal redress can be addressed to the National Authority for Data Protection and Freedom of Information .

Name: National Authority for Data Protection and Freedom of Information

Headquarters: 1125 Budapest, Szilágyi Erzsébet avenue 22 / C.

Mailing address: 1530 Budapest, Pf. : 5.

Phone: 06.1.391.1400

Fax: 06.1.391.1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

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