

DATA PROTECTION INFORMATION TO BE UPLOADED TO HOMEPAGE AT  
[HTTP://WWW.ELI-ALPS.HU/](http://www.eli-alps.hu/)

**1. Name of Data Controller**

*Data controller*

name: ELI-HU Research and Development Non-profit Limited  
Liability Company  
short name: ELI-HU Non-profit Ltd.  
corporate registration number: Cg.06-09-015211  
headquarters: 6728 Szeged, Wolfgang Sandner u. 3.  
e-contact: [info@eli-alps.hu](mailto:info@eli-alps.hu)  
represented by: Dr. Gábor Szabó Managing Director  
contact of data protection officer: [dataprotectionofficer@eli-alps.hu](mailto:dataprotectionofficer@eli-alps.hu)

**2. Data Processing rules**

ELI-HU Research and Development Non-profit Ltd. (hereinafter the Company) on the basis of its Data Protection Regulation processes personal data in connection with this present interface. The material scope of the Regulation covers all those procedures running at any of the Company's organisational units, in the course of which personal data as specified in Section 3, point 2 of Infotv. are processed.

Personal data may exclusively be processed for a specific purpose to realize rights or fulfil obligations. In each phase of data management it must comply with the purpose of data collection and the collection of data must be fair and legal. The use of personal data in the control of the Company for private purposes is prohibited. Data controlling should always correspond with the purpose limitation principle, only such personal data can be managed that is inevitable for the purpose of the data management and suitable for achieving its goals. Personal data can be managed only in the extent and for the period of time necessary for achieving its goals.

Personal data may be processed by the Company to the minimum extent and for the shortest period necessary for the achievement of the specified and explicit purposes, where it is necessary for the implementation of certain rights and obligations. The purpose of processing must be satisfied in all stages of data processing operations, and in case the purpose of data processing has ceased or the data controlling otherwise violates the law, data should be erased.

The Company may manage personal data only based on the legal grounds specified in Articles 6-10 of GDPR chapter II also respecting the principles for managing personal data.

Prior to capturing a data, the Company in all cases informs the data subject about the purpose and the legal ground of data processing.

Employees actually processing data at the organisational units of the Company and the employees of organisations that are designated by the Company to participate in data processing or in any of the operations belonging to data processing are obliged to preserve personal data coming to their knowledge, as business secret.

If a person coming under the scope of this Regulation would gain knowledge of the fact that a personal data processed by the Company would be deficient, incomplete or outdated, he/she is obliged to rectify same or arrange for its rectification by the employee responsible for data capturing given the fact that during data management it must be made sure that data is accurate, complete and up-to-date – if that is necessary for the purposes of data management as well as the fact that the data subject can be identified only for the period of time necessary for the purposes of data management.

Data protection obligations applicable to natural or legal persons or organisations without legal personality that are designated by the Company to perform data processing activities should be enforced in the service contract concluded with the data processor.

The ruling Senior Executive Officer of the Company will in due consideration of the specific features of the Company determine the data protection organisation and the scopes of

responsibilities and authorities related to such activity, and designate a person who is responsible for supervising data processing.

In the course of their work, the members of the staff of the Company ensure that unauthorised persons would not view personal data and that personal data should be stored and located in such manner that they would not be accessible, readable, changeable and/or destroyable by unauthorised persons. During data management the Company provides for the proper security of personal data by application of technical and organizational measures that particularly develop protection against unauthorized or unlawful data management, accident loss, destruction or damaging of data.

The data protection system of the Company should be supervised by the Senior Executive Officer through a data protection officer appointed or designated by him/her.

The homepage operated by the Company can be accessed by anyone without revealing his/her identity and giving his/her personal data, also, information can be retrieved from the homepage and the linked sites freely and without restrictions. Meanwhile the homepage gathers non-personal information about its visitors without any restriction. From these pieces of information personal data cannot be retrieved, therefore this is not constituted as data controlling coming under the scope of the GDPR.

On its homepage the Company utilises a web analytics service named Google Analytics. Google Analytics applies cookies and text files downloaded on the computer of the visitor of the website, the aim of which is the facilitation of the analysis of the use of the website. Pieces of information generated by the cookies and related to the use of the website (IP-address of the visitor of the website) are transferred to the server of Google located in the United States of America and are stored there. Google does not interconnect information generated by the cookies with other data, therefore, according to the data protection regulation in force it cannot be deemed to be data processing. By way of appropriately setting his/her browser, the visitor of the website can refuse the application of cookies. By virtue of using the website, the visitor of the homepage consents to the processing of his/her data in the manner and/or the purpose as discussed above.

Pieces of information so acquired are used by Google for the evaluation of the use of the homepage by data subjects, for analyses, compilation of reports on operations performed on the website, and for delivering other services related to operations performed on the homepage and to internet usage.

A more detailed notification on the cookies used for proper operation of the website during a visit to the [www.eli-alps.hu](http://www.eli-alps.hu) website, is accessible at the following link: <https://www.eli-alps.hu/hu/Pages/Suetik>

If any operation on the homepage requires logging in, the Company handles personal data of the visitors in the following manner:

**purpose of data processing:** identification of the visitors of the homepage; making such electronic services available for them that require registration (particularly user services, career registry, participation in events, visiting the visitors' centre)

**scope of processed data:** starting and finishing time of the visit of the user, and/or in certain cases – dependently upon the settings of the user's computer – the type of the browser and the operating system, IP address, other captured data (cookies) in the case of operation requiring logging in: name, e-mail address, phone number, furthermore, in case of career registry, the CV and the data contained therein as well as citizenship of registering as a user

**legal ground of data processing:** consent of the data subject based on Article 6(1) Point a) of the GDPR

**time scope of data storage:** until the achievement of the purpose of data processing

**data storage method:** electronically

## **Enforcement of the rights of data subjects**

### **Right to Information:**

The data subject may request information on the processing of his / her personal data, as well as request the correction or deletion of his / her personal data at the contact details of the Company, with the exception of the data processing ordered by law.

The Company is obliged to forward the received application or protest to the head of the organizational unit responsible for data management within three days of receipt.

The head of the organizational unit with tasks and competencies shall respond to the request related to the processing of the personal data of the data subject in writing in a comprehensible form no later than 25 days - or 15 days in the case of exercising the right to protest.

If the assessment of the case is unclear during the exercise of the data subject's rights, the head of the data processing unit may request a resolution from the data protection officer by sending the case file and his/her position on the case, who shall comply with it within three days.

The notification covers the information specified in Article 15 (1) of the GDPR, insofar as the information of the data subject cannot be refused by law. The Company shall take appropriate measures to provide the data subject with all information concerning the processing of personal data referred to in Articles 13 and 14 of the GDPR and notification in accordance with Articles 15 to 22 and Article 34 of the GDPR shall be provided in a concise, transparent, comprehensible and easily accessible form, in a clear and comprehensible manner. The notification shall be provided in writing or by other means, including, where appropriate, by electronic means. Oral information may be provided at the request of the data subject, provided that the identity of the data subject has been otherwise established.

The notification is, in principle, free of charge, and the Company may charge a fee only in the case specified in Article 12 (5) (a) of the GDPR.

The Company shall reject the application only for the reasons specified in Article 12 (5) (b) of the GDPR, and this may only be done in writing, with due justification and appropriate information.

**Right to Correction and Deletion (right to be forgotten):**

Inaccurate data shall be corrected by the head of the department processing the data, if the necessary data and authenticating instruments proving them are available, and shall take steps to delete the processed personal data if the reasons set out in Article 17 of the GDPR exist.

The data subject shall have the right to request the deletion of the personal data concerning him without undue delay and the Company shall delete the personal data concerning him without undue delay, in particular if one of the following reasons exists:

- personal data are no longer required for the purpose for which they were collected or otherwise processed;
- the data subject withdraws his or her consent and there is no other legal basis for the processing;
- the data subject objects to the data processing and there is no overriding legitimate reason for the data processing or the data subject objects to the data processing for the direct acquisition of business;
- personal data have been processed unlawfully;
- personal data were collected in connection with the provision of information society services to children under the age of 16;
- if the Data Controller has disclosed the personal data and the personal data are no longer needed for the purpose for which they were collected or otherwise processed, it shall be deleted and the data controller shall take reasonable steps, taking into account the available technology and implementation costs, including technical measures to inform the controllers that the data subject has requested the deletion of links to the personal data in question or of a copy or duplicate of such personal data.

**Protest against the management of personal data:**

The data subject has the right to object to the processing of his / her personal data at any time by means of a declaration to the Company, in particular if the processing or transfer of personal data is necessary solely to fulfill a legal obligation to the Data Controller or a legitimate interest of the Data Controller, except for mandatory data processing or if the use or transfer of personal data is for the purpose of direct business acquisition, public opinion polling or scientific research; and in other cases specified by law.

For the duration of the examination of the data subject's objection to the processing of personal data, but for a maximum of 5 days, the data controller shall suspend the processing, examine the validity of the objection and make a decision, informing the applicant in accordance with Article 19 of the GDPR.

If the objection is justified, the controller shall act in accordance with Article 21 of the GDPR.

If the Data Controller finds that the data subject's objection is justified, the data processing, including further data collection and data transfer, shall be terminated, the data shall be blocked and the protest and the measures taken on the basis thereof shall be notified to all persons to whom the personal data has been transmitted and so who are obliged to take measures to enforce the right to protest.

If the data subject does not agree with the decision of the Data Controller, or if the Data Controller fails to meet the deadline for replying, the data subject may apply to a court within 30 days from the notification of the decision or the last day of the deadline.

If the data recipient does not receive the data necessary for the exercise of the data subject's right due to the data subject's protest, he / she may apply to court against the Data Controller in 15 days from the service of the notification in order to obtain the data. The Data Controller may also sue the data subject.

If the Data Controller fails to notify, the Data Receiver may request information from the Data Controller regarding the circumstances related to the failure of the data transfer, which the Data Controller is obliged to provide within 8 days after the delivery of the Data Recipient's request. In the event of a request for information, the data recipient may turn to court against the Data Controller within 15 days of the provision of the information, but no later than within the open deadline. The Data Controller may also sue the data subject.

The Data Controller may not delete the data of the data subject if the data processing has been ordered by law. However, the data may not be transferred to the data recipient if the data controller has agreed to the protest or the court has established the legitimacy of the protest.

If the assessment of the case is unclear in the exercise of the data subject's rights, the head of the department handling the data may request a resolution from the Data Protection Officer by sending the case file and his / her position on the case, who shall comply with it within three days.

**Right to restrict data processing:**

The data subject has the right to request the Company to restrict the data processing if

- the data subject disputes the accuracy of the personal data (in this case, the restriction applies to the period of time that allows the Company to verify the accuracy of the personal data);
- the processing is unlawful and the data subject opposes the deletion of the data and instead requests that their use be restricted;
- the Company no longer needs personal data for the purpose of data processing, but the data subject requests it in order to submit, enforce or protect legal claims;
- the data processing is necessary for the performance of a task in the public interest or the data processing is necessary for the legitimate interests of the Company or a third party and the data subject has objected to the data processing for these purposes (in this case the restriction takes precedence over the legitimate reasons of the data subject).

Restriction of data management means that the Company does not process the personal data affected by the restriction, except for storage, or only to the extent to which the data subject has consented, or the Company may, in the absence of such consent, handle the data necessary to protect the rights of another natural or legal person or in the overriding public interest of the Union or of a Member State of the European Union. The Company informs the data subject in advance about the lifting of the data management restriction.

**The Right to Data Portability:**

In the course of the data management activities of the Company recorded in this privacy policy, no data management is carried out that would require the provision of data portability.

**Automated Decision Making in Individual Cases, Including Profiling:**

---

Automated decision-making does not take place during the Data Controller's data management.

**Right to Compensation for Damage Caused by Unlawful Data Processing:**

The data controller shall also reimburse the damage caused to others by the unlawful processing of the data subject's data and by the breach of data security requirements, furthermore the damages caused by the personal data breach by him or by the data processor used by data controller. The data controller shall be released from liability for the damage caused and the obligation to pay damages if he proves that the damage or the violation of the data subject's personal rights was caused by an unavoidable cause outside the scope of data processing. Likewise, it does not compensate for damage if it was caused by the intentional or grossly negligent conduct of the injured party.

**Right to Legal Remedy:**

The relevant legal remedy or complaint may be addressed by the data subject to the Company's data protection officer (Dr. Papp Viktória; dataprotectionofficer@eli-alps.hu; 6728 Szeged, Wolfgang Sandner u. 3.) directly or, at data subject's option, to the National Data Protection and Freedom of Information Authority (1055 Budapest, Falk Miksa utca 9-11; postal address: 1363 Budapest, Pf. 9.) or to the high court competent based on the place of residence or stay. In order to enforce the right to a judicial remedy, the data subject may, in the context of data processing operations falling within the scope of the data controller's activities, take legal action against the data controller if he considers that the data controller or the data controller acting on his behalf is in breach of the rules laid down in law or in a binding act of the European Union. The court is acting in expedited procedure in the case.

