

**Privacy Information Note  
for Spectators participating in the 2022 Judo Grand Slam**

**1. Introduction**

1.1. The purpose of this Information Note is to define the rules for the collection and processing of personal data of spectators who participate in the 2022 Judo Grand Slam held in Budapest (hereinafter referred to as: the “GS Hungary 2022”), which rules are mandatory for the Organizer of the GS HUNGARY 2022 (the Hungarian Judo Association) and its employees, agents, officers, contractors, subcontractors and the other persons related to the Organizer who shall be obliged to comply with them and respect them.

1.2. In processing personal data, the Organizer shall abide by the principles set out in the data processing legislation, in particular, in Article 5 Paragraph (1) of *Regulation (EU) 2016/679 of the European Parliament and of the Council (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, repealing Directive 95/46/EC and applicable from 25 May, 2018 (hereinafter referred to as: the General Data Protection Regulation (GDPR))*. The Organizer shall at all times act in compliance with the applicable legal requirements for data protection in order to ensure accountability and protect the rights and freedoms of the rightholders of personal data.

1.3. The Organizer has made available the Privacy Policy for the GS HUNGARY 2022 on its website and on the registration interface ([www.judohungary.hu](http://www.judohungary.hu)), which explains the concepts included in this Information Note and also includes other general and detailed rules related to data protection.

1.4. The purpose of this Information Note is to provide information to the data subject(s) under Article 13 Paragraph (1) of the GDPR.

**2. The legal basis and purpose of data management**

2.1. The Organizer is authorized to learn about and manage the personal data of the spectators participating in the GS HUNGARY 2022 (hereinafter referred to as: the “Data Subjects”) if it has the appropriate legal title, thus particularly, if:

a) the Data Subject has given consent to the learning and processing of their personal data for one or more specific purposes;

b) data processing is necessary for compliance with a legal obligation which the Organizer is subject to;

c) data management is necessary for the protection of vital interests of the Data Subject or another natural person;

d) the data management is necessary for the enforcement of legitimate interests of the Organizer (or a third party) (e.g.: fulfillment of contractual obligations), unless the fundamental rights and freedoms or the interests of the Data Subject - which make it necessary to protect the personal data, in particular, if the Data Subject is a child - have a priority against these interests.

e) In addition, in case of special personal data:

fa) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provides for that the prohibition referred to in Paragraph (1) may not be lifted with the consent of the Data Subject;

fb) data processing is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent;

fc) data processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the Data Subject, in particular professional secrecy;

2.2. The purpose of the data management performed by the Organizer in connection with the GS HUNGARY 2022 is in particular the following:

- Broadcasting the GS HUNGARY 2022 to the public, newsfeed;
- Access for the GS Hungary 2022, seating of spectators and organizing the auditorium

2.3. The Organizer may process the personal data of the Data subject if it has the appropriate legal title in accordance with Article 2.1.

2.3.1. The consent of the Data Subject is lawful if it relates to voluntary, clear, specific data processing, is based on adequate provision of information, furthermore, if the rightholder of the personal data is under the age of 18, the processing of personal data is lawful only if and to the extent that the consent is granted or authorized by a parent or guardian exercising parental control over the minor.

2.3.2. The Organizer shall be obliged to make reasonable efforts – taking into account the available technology – to verify in such cases that the consent has been given or authorized by the parent or guardian exercising parental control over the minor.

2.3.3. By uploading the registration, ticking the box on the registration interface and providing his or her data, the Data Subject gives his or her express consent to the management of his or her personal data - specified in Article 3 - by the

Organizer for the purposes specified in Article 2.1, for the period set out in Article 4, and to forward the personal data to the persons referred to in Article 5.

### **3. Categories of personal data concerned; scope of data processed**

The Organizer is authorized to learn about and manage the following personal data for the purpose set out in Article 2.1.:

- a) Full name (last name and first name);
- b) E-mail address;
- c) Image and video recording of the Data Subject

One requiring person is allowed to require more than one ticket.

On the website for registration, only the full name and e-mail address of the requiring person shall be collected. The other persons that the tickets are required for do not have to give their full name or e-mail address.

Following their accession, a photo can be taken of certain groups of spectators (eg. judo teams) based on a separate consent of such persons or their representative. The team photo may be used by the Data Manager on its own website or other own media interface. In case a minor person can be seen on such team photo, the consent of the legal representative is needed. For providing of such consent, the requiring person is responsible.

By knowing and accepting the present Privacy Policy, the persons performed on such team photos acknowledge that the Data Manager is entitled to use the team photos on its own website or other own media interface for the purpose of promoting the judo sport and to broadcast the GS HUNGARY 2022 to the public.

Any spectator accepts and acknowledges that by entering the GS Hungary 2022, image and video-recordings can be made of him/her, and that he/she accepts this by entering the GS Hungary 2022.

### **4. Data transmission**

The Organizer shall only transfer the data of the Data Subject to a third party in the following cases:

- a) if the data transmission is required by the law, furthermore, if a court, an authority or other body - as the recipient of the data transmission - delivers its official request to the Organizer (including, in particular, the following cases: management of the result of the COVID test, in case of a positive result, its report, possibly forwarding to the national security service for national security purposes);
- b) the Data Subject has given their express consent to the data transmission, and the recipient of the data transmission is a person with a legal relationship with the Organizer (e.g.: hotel, transportation company, etc.).

### **5. Rights of Data Subjects**

#### **a) Right to receive information**

The Data Subject may request information from the Organizer free of charge about the personal data stored by the Organizer. This means that the Data Subject is authorized to receive feedback from the Organizer as to whether or not the management of his or her personal data is in progress, and, if such data management is in progress, the Data Subject is authorized to get access to his or her personal data and the following information:

- the purpose of data management related to the personal data;
- categories of personal data affected;
- recipients or the categories of recipients to whom or to which the personal data were or will be communicated;
- the planned duration of the storage of personal data, or if this is not possible, the aspects for determining this period;
- the right of the Data Subject to request the rectification or erasure of the personal data relevant to him or her or to restrict the management of the data, and the Data Subject may object to the management of his or her personal data;
- the right to lodge a complaint with a supervisory authority;
- if the data have not been collected from the Data Subject, all the available information on their source;
- in case of automated decision-making mentioned in Article 22 Paragraph (1) and (4) of the GDPR, including also profiling, the comprehensible information relevant to the logics applied in these cases and to the significance of such data management and what are the likely consequences for the Data Subject.

#### **b) Right to rectification**

The Data Subject shall have the right, upon his or her request, to have inaccurate personal data concerning him or her rectified by the Organizer without undue delay. Taking into account the purpose of data management, the Data Subject is authorized to request that incomplete personal data be supplemented, inter alia, by means of a supplementary declaration.

#### **c) Right to data erasure**

The Data Subject shall have the right, at his or her request, to request the erasure of his or her personal data from the Organizer without undue delay if any of the following reasons exists:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

- the Data Subject withdraws consent on which the processing is based under Article 6 Paragraph (1) a) or Article 9 Paragraph (2) a) of the GDPR, and if there is no other legal basis for the data management;
- the Data Subject objects to the management of his or her data according to Article 21 Paragraph (1) of the GDPR, and there is no priority legitimate reason for the data management, or of you object to data management on the basis of Article 21 Paragraph (2) of the GDPR;
- the personal data have been unlawfully processed;
- the deletion of personal data is required to fulfill a legal obligation;
- the personal data have been collected in connection with the provision of information society services under Article 8 Paragraph (1) of the GDPR.

Where the Organizer has made the personal data of the Data Subject public and is obliged to erase such personal data, the Organizer, taking account of available technology and the cost of implementation, shall take reasonable steps to inform third persons who are processing the personal data of the Data Subject that the Data Subject has requested us to delete any links to, or copy or replication of, the personal data in question.

**d) The right to restrict processing**

The Data Subject is authorized to request us to restrict the processing of their personal data if any of the following criteria occurs:

- if the accuracy of the personal data is contested by the Data Subject, restriction shall be valid for a period enabling the Organizer to verify the accuracy of personal data of the Data Subject;
- the processing is unlawful, and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Organizer no longer needs the personal data of the Data Subject for the specified purposes of data management, but the Data Subject requires them to submit, enforce or protect legal claims; or
- the Data Subject has expressed an objection against the data management according to Article 21 Paragraph (1) of the GDPR, in which case, the restriction shall apply to the period of time during which it is established whether or not the legitimate grounds of the Organizer have priority over the legitimate grounds of the Data Subject.

If the restriction requested by the Data Subject is lifted, the Organizer will inform the Data Subject thereof in advance.

**e) 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 Organizer, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data manager without hindrance from the Organizer to which the personal data have been provided, where:

- data management is based on consent given according to point Article 6 Paragraph (1) a) or Article 9 Paragraph (2) a) of the GDPR, or is based on a contract pursuant to Article 6 Paragraph (1) b) of the GDPR, and
- data management takes place in an automated way.

In exercising his or her right to data portability, the Data Subject shall have the right to have the personal data transmitted directly from one data manager to another, where technically feasible.

**f) The right to object**

Under Article 21 Paragraph (1) of the GDPR, the Data Subject may at any time object to the processing of his or her personal data for the purpose of data management according to Article 6 Paragraph (1) f) of the GDPR as described in this Privacy Information Note.

If the Data Subject objects to the management of his or her personal data, the Organizer may not continue to process the personal data of the Data Subject, except where the Organizer demonstrates compelling legitimate grounds for the data management which override the interests, rights, and freedoms of the Data Subject, or are needed for the establishment, enforcement or defence of legal claims.

**6. Enforcement of the rights of the Data Subject**

6.1. If the Data Subject wishes to exercise their rights listed in Article 6, i.e. if he or she requests information, wishes to access his or her personal data stored by the Organizer, to rectify or delete their personal data managed by the Organizer, or restrict the data management or object against it, he or she shall make a request to that effect in writing, electronically or by post.

6.2. The Organizer shall provide the information requested by the Data Subject in writing (by post or e-mail) to the Data Subject without undue delay, but no later than within 30 days of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by another 60 days, of which the Organizer shall inform the Data Subject in writing (by postal mail or electronic mail) within 30 days of receipt of the Data Subject's request.

6.3. If the Data Subject has submitted his or her request electronically, the Organizer shall provide the information primarily by electronic means, unless the Data Subject requests otherwise or this is impossible due to the extent of the requested information.

6.4. If the Data Subject so requests, the information may also be provided verbally, provided that the Data Subject has duly demonstrated his or her personal identity.

6.5. The Organizer shall provide the information or the requested information and measures free of charge; however, if the request is manifestly unfounded or excessive, in particular because of its repetitive character, the Organizer may either charge a reasonable fee taking into account the administrative costs of providing the information or notification, or taking the action requested; or may refuse to take action based on the request.

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6.6. If there is any doubt as to the identity of the person submitting the request, the Organizer may request additional information to confirm the identity of the applicant concerned.

## **7. Remedies**

7.1. If the Organizer has violated the Data Subject's right to protection of personal data, we ask that the Data Subject contact the Organizer so that we can remedy the problem as soon as possible.

7.2. If the Data Subject does not agree with the Organizer's procedure (rejection of the request concerning data management, provision of information, rectification, restriction, erasure), considers that the Organizer has not taken the appropriate steps as requested by the Data Subject, he or she may file a complaint against the procedure with the Hungarian National Authority for Data Protection and Freedom of Information, or a Hungarian court as defined by the Hungarian law.

Hungarian National Authority for Data Protection and Freedom of Information

Registered address: H-1055 Budapest, Falk Miksa u. 9-11.

Postal address: H-1365 Budapest, P.O.Box: 9.

Telephone: +36 (1) 391-1400

Telefax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: [www.naih.hu](http://www.naih.hu)

## **8. Data security**

8.1. Taking into account the current state of science and technology, furthermore, the costs of implementation, the character, scope, circumstances and objectives of data management, furthermore, the risk on the rights and freedoms of natural persons of varying probability and severity, the Organizer shall implement appropriate technical and organisational measures to guarantee data security of a level adequate to the degree of risk.

8.2. The Organizer uses technical and organizational security measures to protect the personal data of the data subjects from modification, damage, destruction or access by unauthorized persons. All personal data provided to the Organizer will be encrypted during transmission to prevent any misuse by any third party. The Organizer constantly reviews the security measures in accordance with the new technological developments.

## **9. Data Manager**

9.1. With regard to the data managed in connection with the GS HUNGARY 2022, the data manager is the Organizer, i.e. the Hungarian Judo Association (*abbreviated name: HJA (Hungarian abbreviation: MJSZ), registered address: H-1146 Budapest, Istvánmezei út 1-3., registration number: 01-02-0000015, registry authority: Metropolitan Tribunal Court, tax number: 18157750-2-42, represented by: dr. László Tóth, Chairman*)

Contact details of the Data Manager:

Correspondence address: H-1146 Budapest, Istvánmezei út 1-3.

Telephone: +36 (1) 460-6865

E-mail: [iroda@judo.hu](mailto:iroda@judo.hu)

## **10. Amendments to this Privacy Information Note:**

10.1. The Organizer shall be authorized to amend this Privacy Information Note.