

# Data Policy

## Processing of Personal Data

Subject also to the provisions under Section 8.2, Magyar Labdarúgó Szövetség (registered office: 1112 Budapest, Kánai út 2.D., Hungary; tax number: 19020848-2-44; identification number: 01 99 016139; hereinafter referred to as “**MLSZ**” “**us**” or “**we**”) is the data controller for personal data processed under this Data Policy and is as such responsible for ensuring that the processing is conducted in accordance with applicable legislation.

This Data Policy is intended to provide information on personal data processing in respect of the volunteers assisting in the conducting of the U21 European Championship (the “**Program**”) to be organized in 2021 by MLSZ under the aegis of the Union of European Football Associations (hereinafter: “**UEFA**”), registering at the dedicated website and entering into a contract with MLSZ (hereinafter: “**Volunteers**”).

### Summary

The preparation of this Data Policy and the provision of the information contained therein is required under Article 13 of Regulation (EU) 2016/678 of the European Parliament and of the Council (hereinafter: “**GDPR**”).

The processing of personal data relating to you as Volunteer is necessary for the following reasons:

1. Registration at the website operated by UEFA (hereinafter: “**Website**”) and the conclusion and performance of the document titled Volunteer Agreement to be concluded between you and MLSZ and concerning your volunteer activity (hereinafter: “**Agreement**”).
2. Performing the accreditation necessary for admission to the matches and related events to be organized in Hungary within the framework of the Program.
3. Production and use of photographs and video recordings of the events of the Program and the activity of volunteers.

This Data Policy is intended to provide detailed and comprehensive information on the data processing activities carried out for achieving the above referenced data processing purposes and their main features (particularly, the data processed, the purpose and legal ground of processing, the data retention period and information regarding possible data transfer).

Should you have any further questions regarding this Data Policy, particularly about how MLSZ uses and protects your personal data, you are always welcome to contact us by using the contact details provided in Section 1.

### 1. What entity is responsible for the processing of your personal data?

The data controller for the personal data processed under this Data Policy, subject also to the provisions under Section 8.2, is MLSZ.

Data relating to the controller:

Name: **Magyar Labdarúgó Szövetség**

Registered address: **1112 Budapest, Kánai út 2.D**

E-mail address: [mlsz@mlsz.hu](mailto:mlsz@mlsz.hu)

Name of data protection officer: **dr. András Bári**

E-mail address of data protection officer: [adatvedelem@mlsz.hu](mailto:adatvedelem@mlsz.hu)

Mailing address: **1386 Budapest 62 P.O. Box 906/1**

## **2. What is "personal data" and "processing of personal data"?**

The term **"personal data"** as used in this Personal Data Policy is any piece of information that, either on its own or together with any other pieces of information, can be used to identify a living individual, and any other data that qualifies as personal data in accordance with the law applicable to MLSZ, including the GDPR.

This Personal Data Policy covers all personal data that is in any form considered **processed** under applicable law in relation to you, including personal data that is collected, kept, stored, transferred, disclosed or otherwise used by MLSZ.

## **3. What personal data is processed and for what purposes?**

MLSZ will only collect and process the personal data about you as explained in this Data Policy and as further set out in the "Data Processing Table" in Sections 8.1, 8.2 and 8.3. We do not use your personal data for profiling or to allow automated decisions being adopted with regard to you.

## **4. How is your personal data protected?**

MLSZ has implemented appropriate technical and organizational measures for the protection of your personal data to ensure that only authorized persons are given access to it. MLSZ uses technical security systems, such as firewalls, encryption technologies, passwords and anti-virus programs, to prevent and avoid unauthorized use of personal data.

In the case of any damage to the security systems and measures that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or unauthorized access to the personal data, then MLSZ shall, without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the competent supervisory authority, unless the personal data breach is unlikely to result in a risk for the rights and freedoms of natural persons. Where the personal data breach is likely to result in a high risk, MLSZ shall, without undue delay,

notify you about the personal data breach, as well as its nature, details and the measures taken.

## 5. For how long is my personal data stored?

We will not store or process your personal data for any longer time than what is necessary to fulfill the purposes for the processing set out in this Personal Data Policy or according to any mandatory applicable law, as further specified in the "Data Processing Table" in Sections 8.1, 8.2 and 8.3.

Thus, when the purpose has been fulfilled in relation to a specific type of personal data, we will delete or anonymize the relevant personal data as soon as reasonably possible.

## 6. With whom do we share personal data?

Your personal data may be shared with UEFA as data processor.

## 7. To what countries will your personal data be transferred?

We do not transfer your personal data to any countries outside Hungary, except for Switzerland, where the UEFA is seated. Data transfer shall take place in accordance with Article 45 of the GDPR and based on an adequacy decision by the Commission.

## 8. Data Processing Table

The Data Processing Table contained in Sections 8.1, 8.2 and 8.3 outlines the categories of personal data collected and processed by MLSZ in relation to you and the purposes for processing each category of data.

These terms are used in the table and may require an explanation:

- **Purpose:** Data shall be processed at all times for specified, explicit and legitimate purposes. Therefore, the purpose of processing refers to the specific purpose for which MLSZ carries out the processing activity.
- **Legal ground:** The processing set out in this Data Policy shall take place on appropriate legal ground as specified in the GDPR. Therefore, legal ground means the legal ground constituting the basis for lawful data processing.
- **Retention time or criteria:** In this column, MLSZ specifies how long your data will be stored.

### 8.1 *Processing carried out for the purpose of registration at UEFA's Website and the conclusion and performance of the agreement with MLSZ*

Scope of the processed data:

Identification data of the Volunteer private individual	surname and first name country of birth place of birth
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	date of birth mother's surname at birth and first name
Other data of the Volunteer	home address, residence (postal code, city, street, number) gender nationality image and voice (photograph, video recording)*
Contact details of the Volunteer	e-mail address telephone number (mobile and home telephone)
Data of Emergency contact person	surname and first name relationship telephone number (mobile and home and office telephone)
Information regarding motivation	Information relating to interest and expectations
Data on education	education area of education, other background information
Data on profession	profession, other background information
Data regarding the Volunteer's experience	experience gained in the field of sport not sport related experience experience gained at major events area of experience description of experience
Data on language knowledge	knowledge of English and/or Hungarian knowledge of other language level of language knowledge
Data on availability	days on which the Volunteer is available times when the Volunteer is available
Uniform size	rain jacket size Polo size hoody size
Designation of preferred area	designation of 3 possible options
Other information	Place of activity (name of host city) Specification as to how the Volunteer learned about the program (e.g. Facebook)

\* No video recording or photograph is to be uploaded for registration, however, such uploading cannot be disabled for technical reasons. If the Volunteer nevertheless uploads them during the registration, such they will be deleted promptly or within one week from uploading at the latest. In the case of uploading, the legal ground for processing is the Volunteer's consent [point a) of paragraph (1) of Article 6 of the GDPR].

Personal data type and source	Purpose	Legal ground	Retention time or criteria
The data specified in Section 8.1  <b>Source:</b> Directly from you when you register at the Website or provide your data in the course of the conclusion and the	Registration for the Program, the conclusion and performance of the Agreement between MLSZ and the Volunteer.	Conclusion and performance of the Agreement [point b) of paragraph (1) of Article 6 of the GDPR].	In the case of applicants selected as Volunteers the data provided at registration will be deleted within 30 days from the conducting of the matches organized in Hungary, with the proviso that pursuant to Section 6 (6)

performance of the Agreement.			of Act LXXXVIII of 2005 the Agreement and the data contained therein will be retained for 5 years as from the date of termination of the Agreement, If the applicant is not selected, his/her data will be deleted within 30 days from the completion of the selection procedure.
The data specified in Section 8.1  <b>Source:</b> Directly from you when you register at the Website or provide your data in the course of the conclusion and the performance of the Agreement.	For the purpose of participation in the next voluntary program following the Program, MLSZ retains the data of Volunteers who grant their consent to such retention. Thus, such Volunteers no longer need to register for the new program.	Voluntary consent [point a) of paragraph (1) of Article 6 of the GDPR].	Until the withdrawal of consent by the Volunteer.
From the data specified in Section 8.1 the data used by the application and location data  <b>Source:</b> Directly from you when you register at the Website or provide your data in the course of the conclusion and the performance of the Agreement, including the use of the relevant application.	Identification of and contact and communication with Volunteers, as well as the supervision of their activity – to facilitate the performance of the Agreement – by way of the dedicated application.	Voluntary consent [point a) of paragraph (1) of Article 6 of the GDPR].	Until the withdrawal of consent by the Volunteer.

UEFA, which operates the Website and the application enabling registration, is considered the data processor in respect of the data processing described in Section 8.1

## 8.2 *Data processing for the purpose of accreditation allowing admission to the matches and related events to be organized in Hungary within the framework of the Program*

Scope of the processed data:

<b>Identification data of the Volunteer private individual</b>	surname and first name country of birth place of birth date of birth mother's surname at birth and first name
<b>Other data of the Volunteer</b>	home address, residence (postal code, city, street, number) gender nationality image

	type, number, date of issue and expiry and issuer of identification document
<b>Contact details of the Volunteer</b>	e-mail address

Personal data type and source	Purpose	Legal ground	Retention time or criteria
The data specified in Section 8.2  <b>Source:</b> Directly from you when you register at the Website or provide your data in the course of the conclusion and the performance of the Agreement.	Ensuring through the accreditation that the Volunteer can obtain admission to the matches and other related events for the purpose of the performance of the Agreement.	Conclusion and performance of the Agreement [point b) of paragraph (1) of Article 6 of the GDPR].	The data used in the course of accreditation will be deleted within 60 days from the conducting of the matches.

UEFA is considered the data processor in terms of the data processing described in Section 8.2, with the proviso that following the end of the group matches, probably after March 31, 2021, the person of the data controller in terms of the data processing described herein will change and instead of MLSZ, UEFA will be considered the data controller, while MLSZ will act in the future as data processor in respect of accreditation for the matches to be organized following such date.

### *8.3 Data processing in relation to the production and use of photographs and video recordings of the events of the Program and the activity of volunteers*

Scope of the processed data:

Personal data of the Volunteer	image voice
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Personal data type and source	Purpose	Legal ground	Retention time or criteria
The data specified in Section 8.3  <b>Source:</b> Directly from you when the photographs and video recordings are taken.	Recording and documenting the events of the Program and the activity of the volunteers, use and disclosure of the recordings produced this way.	Legitimate interest of MLSZ [point f) of paragraph (1) of Article 6 of the GDPR].	As long as the legitimate interest exists, but in any case no longer than for a period of 5 years from the conducting of the Program, with the proviso that in the case of works protected by copyright or related rights the retention time shall last until the end of the duration of copyright protection specified in Act LXXVI of 1999 on Copyright.

The above described data processing is based on a legitimate interest that MLSZ has in the processing, i.e. to enable MLSZ to record the events of the Program and the activity of the volunteers, as well as to use such recordings for documenting, promoting and providing information about the Program and the activity carried out by the volunteers.

A requirement is that such a legitimate interest is not overridden by the interests, fundamental rights or freedoms of you and you have the right to object. In light of the limitations regarding data processing, the safeguards and the technical and organizational measures implemented by MLSZ, MLSZ has established that where the processing of your data is based on MLSZ's legitimate interest, such interest is not overridden by your interests, fundamental rights or freedom relating to data protection. You may contact us at any time to request more information on how we have reached this conclusion.

## **9. What are your rights as regards your personal data?**

### *Right to access and rectification*

You have the right to obtain information on what personal data MLSZ processes regarding you, the source of the data, for what purposes the data has been used, and the identity of parties to whom the data has been provided. You have also the right to, at any time, request a correction of any inaccurate or incomplete personal data. If a request is manifestly unfounded or excessive, in particular because of its repetitive character, MLSZ may charge a reasonable administrative fee or refuse to act on the request.

### *Right to erasure ('right to be forgotten')*

You may request that your personal data be erased in specific circumstances if e.g. (i) the personal data is no longer necessary in relation to the purposes for which it was collected and (ii) there is no lawful reason for continuation of processing, or the processing is unlawful or the personal data has to be erased to comply with a legal obligation to which MLSZ is subject. This list is not exhaustive. Please contact us to receive further information on erasure of your personal data.

### *Right to object*

You are entitled to object to certain processing or request that the processing of the personal data is restricted if (i) the personal data may not be correct, or (ii) you consider the processing to be unlawful, or (iii) you believe that MLSZ does no longer need the personal data for the purposes as set out in the "Data Processing Table" in Section 8.

## **10. What should you do if you have any complaints?**

If you have any complaints on how we use your personal data, or would like further information, we would ask you to first contact us. However, you can also always make a complaint about how we process your personal data with the supervisory authority, being the Hungarian National Authority for Data Protection and Freedom of Information (address: Falk Miksa utca 9-11., Postacím: 1363 Budapest, Pf. 9., Telephone: +36 (1) 391-1400, E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

Without prejudice to your rights to make complaints, where you consider that your rights under this Data Policy have been infringed as a result of the processing of your personal data in non-compliance with the applicable laws, you may also bring proceedings before the competent courts.

In any event, it is advisable that, in order to resolve the issue more quickly and effectively, you send any complaints or enquiries to MLSZ first prior to addressing the authorities.

## **11. Updates**

MLSZ may modify this Personal Data Policy at any time. Should MLSZ wish to use personal data other than as stipulated in the Personal Data Policy in force at the time of data collection, notice of any such modifications will be provided to you in a visible manner (e.g. such notice may be sent to you via email).

This Data Policy shall take effect as of December [ \* ], 2020.