

## PRIVACY POLICY

Act CXII of 2011 on the right to self-determination in relation to information and freedom of information (hereinafter: Infotv.), and Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter: GDPR), I hereby provide the following information in relation to data processing activities involving the processing of personal data in connection with coordination, administrative, and registration tasks related to regeneration and recreation services:

### 1. Name and contact details of the data controller:

- a) name of the data controller: Hungarian Defence Forces Recreation, Training and Conference Center (MH RKKK),  
contact details: website: [www.honvedudulo.hu](http://www.honvedudulo.hu), email address: [mh.rkkk@hm.gov.hu](mailto:mh.rkkk@hm.gov.hu), actual place of data processing: 8172 Balatonakaratty, Tompa Mihály utca 1. (Honvéd Ütülő), 8174 Balatonkenese, Kikötő utca 138. (Honvéd Kemping), HM telephone: 02-32-1220, city telephone: 06-88/594-675, fax: 02-32-1230, 06-88/594-676
- b) Data controller representative: Lieutenant Colonel Ferenc Fehér, commander

### 2. Contact details of the data protection officer:

Data protection officer of the data controller: Dr. Henriett Szalai-Szmodics, defense employee  
Contact details: e-mail: [szmodics.henriett@mil.hu](mailto:szmodics.henriett@mil.hu), city phone: +36 88 594 675 (1150 extension), HM phone: 02-32-1150

### 3. Purpose of data processing:

The purposes of data processing are set out in Section 76. § (2) and (4) of Act XXI of 2022 on defense data processing (hereinafter: Hak.tv.) and Act CLVI of 2016 on the state's tasks in the development of tourist areas, which are as follows:

- a) registration of applicants intending to use recreational services,
- b) determining and verifying the applicant's eligibility,
- c) determining and verifying the status of family members and non-eligible relatives of the applicant,
- d) confirmation of needs, issuance of referrals,
- e) satisfaction of special accommodation and meal requirements,
- f) determining the percentage of the discounted reimbursement fee to be paid,
- g) determining the waiver of fees for the third and subsequent children,
- h) assessing the payment or reimbursement of the full or reduced amount of services not used,
- i) filling cancelled places based on additional requests, depending on the number of places available,
- j) recording the use of recreational services, and
- k) concluding fixed-term contracts for the storage of caravans and motorhomes on the premises of Honvéd Camping,
- l) maintaining contact,
- m) data provision to the Guest Information Closed Database (VIZA).

### 4. The provision of personal data is based on legislation and is a prerequisite for using the service. If personal data is not provided, it will not be possible to use the service.

5. Legal basis for data processing, scope of data processed, duration, source of data:

Data processing				
Purpose	Legal basis	Data processed	Duration	Source of data
a) Registration of applicants intending to avail themselves of recreational services.	Section 5 (1) a) of the Info Act and the authorization granted under Section 76 (2) a) of Act XXI of 2022 on Defense Data Management and Military Data Management (hereinafter: Hak.tv.).	<p><i>Eligible person</i></p> <ul style="list-style-type: none"> <li>a) personal identification data (name, birth name, date of birth, mother's name)</li> <li>b) tax identification number</li> <li>c) personnel group/rank</li> <li>d) place of service/work</li> <li>e) place of service/work</li> <li>f) address</li> <li>g) personal identification suitable ID card document ID, validity period</li> <li>h) military identification document number, period of validity (in particular, military service card, government official card, civil servant card, military pensioner card, temporary service card, and official and inspector card details)</li> <li>i) marital status (in particular, data from marriage certificates and cohabitation declarations)</li> </ul> <p><i>eligible family member, non-eligible relative, or person not included in the group of eligible persons</i></p> <ul style="list-style-type: none"> <li>j) personal identification data (name, birth name, date of birth, mother's name)</li> <li>k) tax identification number</li> <li>l) personnel group/rank</li> <li>m) place of service/work</li> </ul>	Pursuant to Section 76 (5) of the Hak.tv., 3 years in respect of the applicant's personal identification data and tax identification number, and 3 months following the use of the service in respect of all other data.	the eligible person

		<ul style="list-style-type: none"> <li>n) address</li> <li>o) Degree of kinship to the eligible person</li> <li>p) identification number of identity document, period of validity</li> <li>q) military identification document number, period of validity (specifically data from: military service ID, civil service ID, public employee ID, military retiree ID, temporary service ID, and official and inspector ID cards)</li> </ul>		
b) determination and verification of the applicant's eligibility	Infotv. Section 5(1)(a) and Haktv. Section 76(3) b) Authorization granted in Section 5 (1) a) and Section 76 (3) of the Haktv.	<p><i>Eligible person</i></p> <ul style="list-style-type: none"> <li>a) personal identification data (name, birth name, date of birth, mother's name)</li> <li>data relating to service performance</li> <li>b) military identification document number, period of validity (specifically data from: military service ID, civil service ID, public employee ID, military retiree ID, temporary service ID, and official and inspector ID cards)</li> <li>c) position held</li> <li>d) date of return from the area of operations</li> <li>e) duration of service in the area of operations</li> </ul>	pursuant to Section 76(5) of the Haktv. applicant personal identification data and tax identification for 8 years for other data for 3 months following the use of the service 3 months following use of the service	the eligible person
c) determining and verifying the applicant's family member status or non-eligible relative status	Infotv. Section 5 (1) (a) and Haktv. Section 76 (3) c) authorization granted in point c).	<p><i>Eligible</i></p> <ul style="list-style-type: none"> <li>a) personal identification data (name, birth name, date of birth, mother's name)</li> <li>b) marital status (in particular, data from the marriage certificate and cohabitation declaration)</li> </ul> <p>family member, gender beneficiary relative data necessary for determining and verifying status;</p>	pursuant to Section 76(5) of the Haktv. applicant personal identification data and tax identification for 8 years for other data for 3 months following the use of the service 3 months following use of the service	the eligible person

		<p>c) family members, non-eligible relatives (in particular their personal identification data, birth certificate, document establishing the employment relationship of foster parents, data on the adoption document);</p> <p>d) data certifying student status (in particular, school attendance certificate, student status certificate, student ID card data);</p>		
d) confirm ation of requests, issuance of referrals	Infotv. Section 5 (1) (a) and Haktv. Section 76 (3) d) authorization given in point d).	<p>a) name of applicant</p> <p>b) Applicant's address</p> <p>c) Name of the non-eligible relative of the applicant's family member</p>	pursuant to Section 76(5) of the Haktv. applicant personal identification data and tax identification for 8 years for other data for 3 months following the use of the service 3 months following use of the service	the eligible person
e) meeting special accommodation and meal requirements	Infotv. Section 5 (1) (a) and Haktv. Section 76 (3) e) authorization given in point	<p>data relating to health status</p> <p>a) infectious disease;</p> <p>b) illness of the applicant or a family member, death of a family member (in particular, medical certificate, outpatient record, hospital discharge report, data from the death certificate);</p> <p>c) medications taken on a regular basis, drug sensitivity;</p> <p>d) mobility restrictions;</p> <p>e) special dietary requirements (in particular data relating to diabetes and food allergies);</p>	for other data, 3 months after using the service	the eligible person

<p>f) assessment of payment or refund of the full or reduced amount of services not used</p>	<p>Infotv. Section 5 (1) (a) and Haktv. Section 76 (3) h) Authorization granted in point (h).</p>	<p><i>eligible person</i></p> <ul style="list-style-type: none"> <li>a) personal identification data (name, birth name, date of birth, mother's name)</li> <li>b) tax identification number</li> <li>c) personnel group/rank</li> <li>d) place of service/work</li> <li>e) place of service/work</li> <li>f) address</li> <li>g) telephone number, e-mail address</li> <li>h) personal identification suitable ID document number, validity period</li> <li>i) marital status</li> <li>j) name of eligible family member, ineligible relative, and person not eligible for benefits</li> <li>k) illness of the applicant or family member, death of a family member (in particular, medical certificate, outpatient record, hospital discharge report, death certificate data)</li> <li>l) information necessary for determining reimbursement discounts</li> <li>m) reimbursement code</li> </ul>	<p>pursuant to Section 76(5) of the Haktv. applicant personal identification data and tax identification for 8 years for other data for 3 months following the use of the service 3 months following use of the service</p>	<p>the eligible person</p>
<p>g) filling of cancelled places based on additional requests, depending on the number of places that have become available,</p>	<p>Infotv. Section 5 (1) (a) and Haktv. Section 76 (3) i) authorization given in point</p>	<p><i>eligible person</i></p> <ul style="list-style-type: none"> <li>a) personal identification data (name, birth name, date of birth, mother's name)</li> <li>b) tax identification number</li> <li>c) personnel group/rank</li> <li>d) place of service/work</li> <li>e) place of service/work</li> <li>f) address</li> <li>g) personal identification suitable ID card document ID, validity period</li> <li>h) military identification document number, validity period (specifically data from: military service ID, civil service ID, public employee ID, military retiree ID, temporary service ID, and official and inspector ID cards)</li> </ul>	<p>pursuant to Section 76(5) of the Haktv. applicant personal identification data and tax identification for 8 years for other data for 3 months following the use of the service 3 months following use of the service</p>	<p>the eligible person</p>

		<p>i) family status (in particular, data from marriage certificates and declarations of cohabitation)</p> <p><i>non-eligible relatives of the, and persons not eligible for benefits</i></p> <p>j) personal identification data (name, birth name, date of birth, mother's name)</p> <p>k) tax identification number</p> <p>l) personnel group/rank</p> <p>m) place of service/work</p> <p>n) address</p> <p>o) degree of kinship to the beneficiary</p> <p>p) identification number of identity document suitable for personal identification, period of validity</p> <p>q) military ID number, period of validity (specifically data from: military service ID, civil service ID, public employee ID, military retiree ID, temporary service ID, and official and inspector ID cards)</p>		
h) records of the use of recreational services	Infotv. Section 5 (1) (a) and Haktv. Section 76 (3) j) authorization given in point	<p><i>Eligible person</i></p> <p>a) personal identification data (name, birth name, date of birth, mother's name)</p> <p>b) tax identification number</p> <p>c) personnel group/rank</p> <p>d) place of service/work</p> <p>e) place of service/work</p> <p>f) address</p>	pursuant to Section 76(5) of the Haktv. applicant personal identification data and tax identification for 8 years for other data for 3 months following the use of the service 3 months following use of the service	the eligible person

		<p>g) identification suitable document identification number, validity period</p> <p>h) military identification document number, period of validity (specifically data from: military service ID, civil service ID, public employee ID, military retiree ID, temporary service ID, and official and inspector ID cards)</p> <p>i) marital status (in particular, data from marriage certificates and cohabitation declarations)</p> <p><i>non-eligible relatives of the eligible family members, and persons not eligible for benefits</i></p> <p>j) personal identification data (name, birth name, date of birth, mother's name)</p> <p>k) tax identification number</p> <p>l) personnel group/rank</p> <p>m) place of service/work</p> <p>n) address</p> <p>o) degree of kinship to the beneficiary</p> <p>p) identification number of identity document, period of validity</p> <p>q) military identification document number, period of validity (specifically data from: military service ID, civil service ID, public employee ID, military retiree ID, temporary service ID, and official and inspector ID cards)</p>		
i) fixed-term contract for the storage of caravans and motorhomes on the Honvéd Camping site	Infotv. Section 5 (1) (a) and Haktv. Section 76 (3) j) authorization given in point	caravans, motorhomes, and the identification data of their owners and operators (in particular personal identification data, vehicle registration data);	pursuant to Section 76(5) of the Haktv. applicant personal identification data and tax identification for 8 years Data from accounting documents directly supporting the accounting records for the eight years following their issuance.	the eligible person

j) maintaining contact	GDPR Article 6(1) e) point	e-mail address, telephone number, contact address, if different from the residential address	the 2 years following the use of the service	the eligible person
k) data recording and data transfer for the VIZA system	GDPR Article 6(1) e) point	<i>Eligible person</i> a) surname and first name; b) family name and given name at birth; c) place and date of birth; d) gender; e) citizenship; f) mother's birth surname and first name; g) identification details of the identity document or travel document.	the 2 years following the use of the service	the eligible person

## 6. Data disclosure, data transfer, data processing:

- a) We disclose data in response to requests from official bodies (e.g., police, public prosecutor's office, court).
- b) In the recording and transfer of data to the VIZA system, the accommodation provider is the data controller of the guest's personal data, and MTÜ is the data processor of the accommodation provider.
- c) We do not intend to transfer data to third countries or international organizations.
- d) We do not use data processors.

## 7. Description of the rights of the data subject and how to exercise them:

**a) You have** the right to ***be informed*** about the facts related to data processing prior to the commencement of data processing. This information serves to enforce your right.

**b) You may request** the following from us:

**ba) access to** your personal ***data***, ***you may request that we inform you*** of the purpose and legal basis of the data processing, the scope and source of the personal data concerned, and the recipients or categories of recipients to whom we have disclosed or will disclose your personal data. the planned duration of storage of the personal data, your rights, and any data protection incidents that may have occurred in connection with your personal data.

**bb) the rectification of your** personal ***data*** if it is inaccurate, incorrect or incomplete.

**c) In order to *exercise the right to erasure***, the data controller shall erase personal data without delay if

ca) the data processing is unlawful

- it is contrary to the data protection principles laid down in the Infotv
- the purpose of the data processing has ceased to exist or the data processing is no longer necessary for the achievement of the purpose
- the period of data processing specified by law has expired
- the legal basis for data processing has ceased to exist and there is no other legal basis

for data processing cb) the deletion of personal data has been ordered by law, an EU act, a data protection authority or a court

cc) the period of restriction of data processing has expired and the data should be erased

**d) In order to protect your rights, the data controller may order the restriction of data processing** in the following cases:

da) if you contest the accuracy of your personal data, in which case the restriction applies for a period enabling the controller to verify the accuracy of the personal data

db) if the data should be deleted, but there are reasonable grounds to believe that the deletion would prejudice your legitimate interests, in which case the restriction shall last until your legitimate interests cease to exist,

dc) if the data should be deleted, but it is necessary to retain it as evidence

**You may exercise your above rights by contacting us at any of the contact details provided.**

## 8. Legal remedy:

In the event of a breach of the rules on the processing of personal data, you may contact the data controller's data protection officer, the court with jurisdiction over your place of residence or stay, or lodge a complaint with the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., tel.: +36 (1) 391-1400; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) ; website: [www.naih.hu](http://www.naih.hu)).