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PRIVACY POLICY

The **Hungarian Ice Hockey Federation** has created a questionnaire for the fans and followers (hereinafter fans) of the senior men's top division ice hockey championship (hereinafter Erste Liga) , to provide an opportunity to explore fans' needs and preferences in order to better meet their expectations.

Completion of the questionnaire is voluntary and does not involve the processing of personal data or contact details.

This privacy policy covers the **processing of personal data** in connection with the interface used to fill in the questionnaire (Cognito Forms) and the questions contained in the questionnaire..

1. Controller

Name: Hungarian Ice Hockey Federation (hereinafter: HIHF or Federation).

Registered office and postal address: 1146 Budapest, Istvánmezei street 1-3.

Phone: +36 1 460 6863

Fax: +36 1 460 6864

E-mail: info@icehockey.hu

2. Name and contact details of the Data Protection Officer

Data Protection Officer of the Federation: Vivien Lehoczki-Gulyás

Contact: adatvedelem@icehockey.hu

3. Adatkezelés jogalapja

The legal basis for the processing of the data in the context of the completion of the questionnaire is the consent of the natural person completing the questionnaire (hereinafter referred to as "the Data Subject") pursuant to Articles 6(1)(a) and 9(2)(a) of Regulation (EU) 2016/679 of the European Union 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 referred to as "GDPR"). The Data Subject may withdraw his or her consent to data processing at any time. The withdrawal of consent shall not render unlawful any processing previously based on consent.

4. Purpose of processing and scope of the data processed

The data processed by the interface used for filling in the questionnaire will not be merged with the answers given when filling in the questionnaire. The Data Controller aggregates the responses and processes them. The analysis is not based on individual preferences.

When using the interface to fill in the questionnaire:

Personal data	Purpose of data processing
IP address, Mac ID, browser and device type	the identification of devices during communication, to ensure the basic functionality of the interface used for filling in the form, to prevent misuse

Duration of data processing: Cognito Forms processes the data for the purposes set out above, storing it in encrypted form until the date of downloading the responses (31.07.) The Data Controller does not aim to identify the Data Subject.

When completing the questionnaire:

Personal data	Purpose of data processing
<ul style="list-style-type: none">• on the part of the Data Subject in the questionnaire: demographic data,• consumer habits related to sport,• opinions expressed in a fan satisfaction survey,• personal consumption habits,• feedback on communication and marketing activities, suggestions	Fan responses are used to aggregate overall fan preferences. Once the answers to the questions have been saved, the Data Controller will produce an aggregated analysis. The analysis will only include aggregated results and will not include individual responses in any form.

Duration of processing: the Data Controller will keep the aggregated results for 10 years and will irretrievably delete individual responses from its systems. The Data Controller does not aim to identify the Data Subject.

5. Data security

The HIHF undertakes to ensure the security of the data, as well as to take technical and organisational measures to ensure that the data processed are protected and to take all necessary measures to prevent their loss, unauthorised use or unauthorised alteration, in line with current technological



standards. It also undertakes to require any third party to whom it transfers or discloses the data for a specific purpose to fulfil the same obligations.

6. Recipients:

The data processor who evaluates the questionnaires and prepares the analysis:

PricewaterhouseCoopers Hungary Ltd.
1055 Budapest, Bajcsy-Zsilinszky str. 78,

- **The interface used to fill in the questionnaires:**
Cognito Forms

Data subjects' rights in relation to data processing

Right of access

The Data Subject shall have the right to obtain information from the HIHF - through the contact details provided in points 1 and 2 - as to whether personal data concerning his/her are being processed, and, if such processing is in progress, the right to obtain from the HIHF whether the HIHF:

- what personal data
- on what legal basis
- purpose of data processing
- how long will it be kept;

as well as

- to whom, when, under what law, which of his/her personal data has been granted access to or to whom the HIHF has transferred his/her personal data;
- the source of his/her personal data;
- whether the HIHF uses automated decision-making and its logic, including profiling.

The HIHF shall provide a copy of the personal data undergoing processing to the Data Subject for this purpose upon request, it shall make it available free of charge for the first time, after which it shall be administratively may charge a reasonable fee based on costs.

In order to meet data security requirements and to protect the rights of the Data Subject, the HIHF is obliged to satisfy the Data Subject and the person wishing to exercise his right of access, the matching of his/her identity, to this end, the provision of information, inspection or the issue of a copy thereof shall also be subject to the identification of the person concerned.

Right to rectification

The Data Subject may request that the HIHF amend any of his/her personal data by contacting the contact details provided in points 1 and 2. If the Data Subject can credibly prove the accuracy of the corrected data, the HIHF will fulfill the request within a maximum of one month and will notify the person concerned at the contact details provided by him/her.



Right to blocking (restriction of processing)

The Data Subject may, through the contact details provided in points 1 and 2, request that the the processing of his/her personal data is restricted by HIHF (due to the limited nature of the processing and ensuring that treatment is kept separate from other data) where:

- disputes the accuracy of his/her personal data (in which case the HIHF refers to the limit the processing for as long as you control the processing of personal data accuracy)
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims
- the Data Subject has objected to the processing (in this case, the restriction applies to the period until it is established whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the Data Subject.

Right to object

The Data Subject may object to the processing at any time on grounds related to his/her particular situation through the contact details provided in sections 1 and 2 if he or she considers that HIHF would not process his/her personal data properly in connection with the purpose indicated in this privacy policy. In this case, it is for the HIHF to demonstrate that the processing of the personal data is justified by compelling legitimate grounds which override the interests, rights and freedoms of the Data Subject or which are related to the establishment, exercise or defence of legal claims.

Right to erasure

The Data Subject may request the erasure of his/her personal data if:

- the HIHF no longer needs it for the purposes for which it was collected or otherwise processed
- the Data Subject withdraws his/her consent and there is no other legal basis for the data processing
- the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing
- if the personal data have been unlawfully processed
- where the personal data have to be erased in order to comply with a legal obligation to which HIHF is subject
- if the personal data have been collected in connection with the offer of information society services.

Right to legal remedy

If you have any questions or complaints about this data processing, please contact HIHF at one of the following contact details::

E-mail: adatvedelem@icehockey.hu,

Registered office and postal address: 1146 Budapest, Istvánmezei street 1-3.

Phone: +36 1 460 6863



We will always investigate the complaint of the Data Subject and will do our best to deal with it appropriately. Within thirty days of the request, the HIHF will comply with the Data Subjects' request to exercise their rights. Depending on the number and complexity of the requests received, this time limit may be extended by a further two months, and the reasons for this extension will be communicated to the Data Subject within one month.

If, despite your complaint, you still object to the way in which your personal data are processed by the HIHF or do not wish to lodge a complaint with the HIHF , you may lodge a complaint with the HIHF using the following contact details.

Contact details of the Supervisory Authority:

National Authority for Data Protection and Freedom of Information (NAIH)

Address: 1055 Budapest, Falk Miksa street 9-11.

Postal address: 1363 Budapest, Pf.: 9.

Phone number: 06 1/391-1400 Fax: 06 1/391-1410

This privacy policy is valid from: 09 June 2023.

