

PRIVACY NOTICE

Dear Visitor,

Thank you for your visit to the mtkbudapest.hu website, operated by MTK Budapest.

MTK Budapest places particular emphasis on the protection of your personal data, therefore we do our best to provide transparent, intelligible, clear and comprehensive information to you in this Privacy Notice regarding the data processing operations of MTK Budapest (hereinafter: MTK Budapest or Data Controller).

MTK Budapest has prepared this Privacy Notice concerning the operation of the www.mtkbudapest.hu website and the webshop.mtk.hu webshop in compliance and in line with the provisions of 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), applicable from 25 May 2018, as well as Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: Privacy Act).

Due to the development of the internet and constant changes in legislation, every now and then we need to amend our Privacy Notice.

In processing the personal data made available to it voluntarily by third persons (hereinafter: User or Users), MTK Budapest adheres to the following principles and conditions of processing and data protection:

1 Data We Collect and Process, the Purpose of Data Processing

On the MTK Budapest website, the Users may provide information and data concerning themselves to the Data Controller in connection with the use of the website, through the information provided in connection with such use (anonymous data collection), as well as by way of their subscription to the MTK Budapest Newsletter and/or by ordering a product from the MTK Webshop (via the personal data expressly provided by the User).

1.1 Anonymous Data Collection and Data Processing

If the User views the MTK Budapest website and the MTK webshop, the Data Controller will not collect or process any personal data concerning the User in a way allowing for the User's personal identification. In the course of anonymous data collection, we only collect and process the following data: the name of your internet provider, your IP address, the name of the referrer site, and the name of the websites where you navigate from one of our sites.

Accordingly, you can also use the MTK Budapest website and MTK webshop without revealing your personal data. The use of the MTK Budapest website and the MTK webshop is not conditional upon the provision of your personal data, unless this is necessary for providing you with further information upon your request (newsletter, webshop).

So, whenever you visit the MTK Budapest website or the MTK webshop and use them, we store data on our servers for various security reasons. These data may be suitable for your identification; however, we do not use them for such purposes. Time and again we use the data

for statistical purposes; however, since we do that by keeping the anonymity of every single user, nobody can be identified. If we make these data available to others within MTK Budapest, we use appropriate technical and organisational measures to ensure compliance with the data protection regulations.

By visiting the MTK Budapest website and the MTK Webshop, you consent to the Data Controller recording the data and information specified in this section, and placing cookies (see below) necessary for such recording; such data will not be combined with any other personal user data, and do not make the User personally identifiable. Nobody else but the Data Controller has access to these data.

These anonymous data are primarily used so that the Data Controller can properly, securely and smoothly operate the websites, which requires in particular tracking the visitation data of the various websites, and filtering out any abuses in relation to the use of the websites. The legal basis of anonymous data processing is point (f) of Article 6(1) of the GDPR i.e. the legitimate interest of MTK Budapest.

Please be informed that the data specified in this section are not transferred to any third party, and we only store them for 30 days, following which they are automatically deleted.

1.2 Collection and Processing of Personal Data

MTK Budapest only processes the personal data made available to it by the Users voluntarily upon subscribing to the MTK Budapest Newsletter or upon placing an order with the online store at www.webshop.mtk.hu (Webshop) in awareness of the conditions and manner of data processing, and where the data subjects concerned have given their prior, express and voluntary consent to the processing of their data by MTK Budapest.

We collect personal data in case of subscription to the MTK Budapest Newsletter and/or purchases from the webshop on the www.webshop.mtk.hu website. Providing the data is voluntary. Those subscribing to the MTK Budapest Newsletter and/or using the Webshop and wishing to use the services of MTK Budapest and the MTK webshop, acknowledge and expressly consent to MTK Budapest as the Data Controller processing their provided personal data for the purposes of such use, in connection with the services, until withdrawal. Your personal data will remain with MTK Budapest as the Data Controller, and will only be sent to processors or onto servers who act on our behalf, have obligations towards us and fully comply with the effective provisions of the GDPR and the Privacy Act. We will not forward your personal data to any third party in any form, unless with your written permission or if mandatorily required by law.

We oversee the use of the personal data you have provided to us, and assume individual liability for ensuring that data processing is carried out securely and in accordance with the rules.

1.2.1 MTK Budapest Newsletter

On the MTK Budapest website, you can subscribe to the MTK Budapest Newsletter. MTK Budapest may regularly send free information or advertisements to Users who have subscribed to the newsletter to inform them of any novelties, first of all by e-mails sent to the User's e-mail address.

Categories of Data Processed

In case of subscription to the MTK Budapest Newsletter, we collect and process the following personal data, which shall be provided upon subscription:

1. full name (surname and first name),
2. e-mail address.

Legal Basis and Purpose of Processing

By subscribing to the MTK Budapest Newsletter, you expressly consent to us sending you information, advertisements, news and offers on a weekly basis to the e-mail address you have provided. Legal basis for processing: point (a) of Article 6(1) of the GDPR.

The purpose of use is the efficient provision of the service, identification of the persons subscribed to the newsletter, providing information to subscribed users regarding the operation of the service, troubleshooting, and sending marketing mails, offers, advertising materials, newsletters, sports news and sports results.

We will only use the collected personal data to provide the information you requested or for other purposes permitted by use, unless a mandatory provision of law requires otherwise.

Right to Object

You have the right to object to the data processing relating to the above purposes. You may withdraw your declaration of consent at any time free of charge, without limitation or having to give the reasons, and you may unsubscribe from the MTK Budapest Newsletter free of charge, in which case we will promptly erase your Personal Data and will stop sending the MTK Newsletter to you.

You can make the declaration on withdrawal online by clicking the link at the bottom of the newsletter or by mail sent to 1087 Budapest, Salgótarjáni út 12-14, Hungary.

Please be aware that in exceptional cases, after the receipt of your objection we may continue to send MTK Newsletters and advertising materials for a while, which may happen for technical reasons, and does not mean that we disregarded your objection. Your data will be erased after this lead time. Thank you for your understanding.

Ensuring Data Security

After your subscription to the MTK Budapest Newsletter (provision of your full name and e-mail address), we will send a confirmation link to your specified e-mail address. We will add your specified e-mail address to our newsletter list only after you have clicked such confirmation link. We use this so-called double opt-in process to ensure that no other person can subscribe to the MTK Budapest Newsletter using your e-mail address, and that no erroneous and/or wrong e-mail address can be provided.

Data Transfer

The personal data provided by you will not be transferred to abroad. The personal data provided by you upon subscribing to the MTK Budapest Newsletter may not be accessed by anyone other than the authorised employees and agents of MTK Budapest's affiliates and the web hosting provider performing processing (see section 6).

1.2.2 MTK Webshop

The MTK Webshop is available from the www.webshop.mtk.hu site. You can order products from the MTK Webshop also without registering from the MTK website and/or logging in. The orders placed with the MTK Webshop and the legal relationships created thereby shall be

governed by the regulations titled General Terms and Conditions no. 1 and 2 applicable to the MTK Webshop that are available on the Webshop site.

Categories of Data Processed

In case of ordering products from the MTK Webshop, we collect and process the following personal data: The following data need to be provided for product orders from the MTK Webshop and receipt or delivery:

1. full name (surname and first name),
2. e-mail address,
3. phone number,
4. home address (city/town, postal code, street and number).

Optionally, you can provide the barcode of your MTK pass (if you have one; card number and date of birth) and/or if you have an MTK fan card, the card number and the PIN code.

Legal Basis and Purpose of Processing

The purpose of data processing is the ordering, purchasing and requesting of product(s) and/or service(s) from the MTK Webshop. By ordering the products and providing their personal data, Users expressly consent to the Data Controller processing their provided personal data for the purposes of the order and purchase of the product and its delivery to the User. The legal basis of processing is point (a) of Article 6(1) of the GDPR and, in regard of the efficient provision of services, points (b) and (f) of Article 6(1) and of the GDPR.

The purpose of use is the efficient provision of the service, identification of the persons placing an order, providing information to those placing an order regarding the operation of the service, troubleshooting, ordering the products from the manufacturers and delivering or sending them to the purchasers.

We will only use the collected personal data to provide the information you requested or for other purposes permitted by use, unless a mandatory provision of law requires otherwise.

Right to Object

You have the right to object to the data processing relating to the above purposes. You may withdraw your declaration of consent at any time free of charge, without limitation or having to give the reasons, in which case we will promptly erase your personal data.

You can make the declaration on withdrawal electronically at the shop@mtkbudapest.hu e-mail address or at the e-mail address listed in the Contact details menu, or by mail sent to our central address, 1087 Budapest, Salgótarjáni út 12-14, Hungary.

Please be aware that in exceptional cases, after the receipt of your objection we may continue to keep your data on record for a while, which may happen for technical reasons, and does not mean that we disregarded your objection. Your data will be erased after this lead time. Thank you for your understanding.

Ensuring Data Security

After you placed an order for a product in the MTK Webshop, we will send a confirmation link to your specified e-mail address. The order you placed for the product will only become valid after you click the confirmation link. We use this so-called double opt-in process to ensure that no other person can order and purchase products from the MTK Webshop using your e-mail address and personal data, and that no erroneous and/or wrong e-mail address and personal data can be provided.

Data Transfer

The personal data provided by you will be transferred to third persons if you want to take delivery of your products ordered from the MTK Webshop by way of courier rather than personal receipt. By opting for delivery by courier, you expressly consent to the Data Controller forwarding the personal data provided by you to the courier service (Sport-print Kft.) or, for a foreign delivery address, to the postal service provider (Magyar Posta Zrt.).

Apart from that, the personal data provided by you upon ordering products from the MTK Webshop may not be accessed by anyone other than the authorised employees and agents of MTK and its affiliates and the web hosting provider performing processing (see section 6).

2. Use of Cookies

On the MTK Budapest website, we use so-called cookies to make your individual use of the website more efficient. The cookies are identifiers our web server may send to your computer to identify the computer used during your visit to the site. Most browsers accept these cookies automatically as their default setting. The information stored in the cookie is recorded on the given equipment, but contain no viruses and will not cause any harm. The storage of cookies can be disabled, or you can configure your browser to send you an alert before a cookie gets stored on your computer.

Cookies are not used for personal identification, they are only used for optimising the MTK Budapest website, ensuring its user-friendly operation, sending offers meeting the Users' needs, and preparing statistics.

According to the above, we use cookies on the MTK Budapest website under point (f) of Article 6(1)(f) of the GDPR.

We process the following cookies:

1. Third party cookies:

a. Cookies used by Google for visitation analysis purposes (__utma, __utmb, __utmc, __utmz, PREF, NID, GAPS). Google has your browser store these Cookies for two years.

b. Cookies used by Facebook for Facebook's functions, e.g. like, share (datr, reg_ext_ref, reg_fb_gate, reg_fb_ref). Your browser stores these Cookies for two years.

2. When banners are displayed, identification of the individual users and clicks (banner); stored in your browser for a year.

3. Registration cookie - Identification of the user's activity on the site until login (registration_cookie). The cookie is stored for a year.

4. The cookie facilitating the website sessions (PHPSESSID). Is deleted upon closing the browser or browser page or upon leaving the page.

You can delete cookies from your browser any time or even disable them. The latter case (disabling) may lead to loss of functionalities.

3. Your Rights as a User (data subject)

You as a User (data subject) shall have the following rights:

a) Right to information

You shall have the right to receive information free of charge on the personal data stored by the Data Controller concerning you. This means that you shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being

processed, and, where that is the case, access to your personal data and the following information:

- the purpose of processing the personal data;
- the categories of personal data concerned;
- the recipients and/or categories of recipient to whom the personal data have been or will be disclosed;
- the envisaged period for which your personal data will be stored, or, if not possible, the criteria used to determine that period;
- your right to request the rectification or erasure of your personal data or the restriction of processing of your personal data, and to object to the processing of your personal data;
- the right to submit a complaint to the supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- in the case of automated decision-making, including profiling, referred to in Article 22(1) and (4), meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

b) Right to rectification

You shall have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you shall also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c) Right to erasure

You shall have the right to obtain from the Data Controller without undue delay the erasure of personal data concerning you where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) GDPR, and where there is no other legal ground for the processing;
- you object to the processing pursuant to Article 21(1) GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2) GDPR;
- the personal data have been unlawfully processed;
- erasure of the personal data is necessary for compliance with a legal obligation;
- the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

Where we have made your personal data public and are obliged to erase the data, taking account of available technology and the cost of implementation, we shall take reasonable steps to inform third parties which are processing the personal data that you have requested the erasure of any links to, or copy or replication of, those personal data.

d) Right to restriction of processing

You shall have the right to obtain from us restriction of processing where one of the following grounds applies:

- you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of your personal data;
- the processing is unlawful and you request the restriction of use instead of erasure of the data;
- the Data Controller no longer needs the personal data for the specified purposes, but they are required by you for the establishment, exercise or defence of legal claims; or

– you have objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the Data Controller override your legitimate grounds. We will inform you in advance if the restriction you have requested is lifted.

e) Right to data portability

You shall have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us where:

- the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1) GDPR; and
- the processing is carried out by automated means.

In exercising your right to data portability, you shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

f) Right to object

Pursuant to Article 21(1) GDPR, you shall have the right to object to the processing of your personal data any time where such processing serves the purposes of processing as per point (f) of Article 6(1) GDPR as described in this Privacy Notice.

Regarding the right to object please consult the provisions of sections 1.2.1. and 1.2.2.

If you object to the processing of your personal data, the Data Controller may no longer process your personal data unless it proves that processing is justified by compelling legitimate grounds which override your interests, rights and freedoms or are necessary for the establishment, exercise or defence of legal claims.

Enforcement of Rights

If you want to exercise your above rights i.e. where you want to receive information, have access to your personal data stored by Data Controller, you want to have your personal data rectified or erased or the data processing restricted, or you wish to object to data processing, please send your relevant request to the e-mail address indicated in the Contact details menu or to our central address 1087 Budapest, Salgótarjáni út 12-14, Hungary.

We will provide you the requested information in writing (by post or electronically) without undue delay but no later than within 30 days from receipt of the request. Please be informed that if necessary, that period may be extended by further 60 days, taking into account the complexity of the request and the number of requests, of which we will inform you in writing (by post or electronically) within 30 days of receipt of the request, together with the reasons for the delay.

Where you have submitted the request by electronic means, the information shall be provided by electronic means where possible, unless your requested otherwise or where that is impossible, given the extent of the information requested.

You can also receive the information verbally if you request, provided that you have properly proven your identity.

Please be informed that we provide the information and/or the requested actions free of charge, however, where your request is manifestly unfounded or excessive, in particular because of its repetitive character, the Data Controller may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- refuse to act on the request.

Where there are reasonable doubts concerning the identity of the natural person making the request, we may request the provision of additional information necessary to confirm your identity.

Remedy

If you believe that MTK Budapest or any of its employees have infringed upon your right to the protection of your personal data, please contact us electronically by e-mail at the address indicated in the Contact details menu or by mail sent to our central address, 1087 Budapest, Salgótarjáni út 12-14, Hungary, so that we can remedy the problem at the earliest possible.

If you do not agree with the procedures of MTK Budapest (data processing, or refusal of your request for information, rectification, blocking or erasure), and you consider that MTK Budapest has not taken the proper actions in line with your request, you may submit a complaint regarding the procedure to the Hungarian National Authority for Data Protection and Freedom of Information, and may also have recourse to court as regulated by law:

Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság)

registered office: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c, Hungary

postal address: H-1530 Budapest, Pf. (PO Box) 5

phone: +36 1 391 1400

telefax: +36 1 391 1410

email: ugyfelszolgalat@naih.hu

web: www.naih.hu

4. Duration of Data Retention

MTK Budapest will process the data—based on voluntary data supply by the Users and their prior, express and voluntary consent given in possession of the information relating to the conditions and method of processing—until withdrawal of the User’s consent to data processing and/or until termination of the purpose of processing specified in this Privacy Notice. We consider the use of the User’s data continuous until they request the erasure of such data from the records. If you wish to unsubscribe from the MTK Newsletter, please follow the instructions provided in section 1.2.1.

5. Security

MTK Budapest uses technical and organisational security measures to protect the processed data from alteration, compromising, destruction, and from access by unauthorised persons. All personal data provided by you to MTK Budapest are encrypted in the course of transfer to prevent any abuse by third persons. Our security measures are regularly reviewed in light of the technological developments.

6. Data Processor

The anonymous and/or personal data relating to the MTK Budapest Website, the MTK Budapest Newsletter and the MTK Webshop are processed by our web hosting provider.

Name of web hosting provider:

Brightly Kft.

registered office: H-2724 Újlengyel, Ady E. utca 41, Hungary

e-mail: brightly@brightly.hu

With a view to the delivery of webshop orders, we will transfer the personal data necessary for delivery to the following persons, depending on the method of delivery specified by the User:

Sport-print Kft.

registered office: H-1108 Budapest, Lenfonó utca 2, Hungary

e-mail: kiss.balazs@sportprint.hu

Magyar Posta Zrt.

registered office: H-1138 Budapest, Dunavirág utca 2-6, Hungary

7. Protection of Persons Under 16 Years of Age

The services offered by the MTK Budapest website may also be used by young people under the age of 16. The processing of the personal data of young people under the age of 16 shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.

In our opinion, making the use of the MTK Budapest website and/or subscription to the MTK Budapest Newsletter conditional upon prior parental consent is not realistic in the world of the internet, however, the statutory representative, upon request, shall have the right to access the information provided by the child, and/or order the erasure of such information.

Pursuant to the law, where the data subject is a minor over 16 years, the consent or subsequent approval of their statutory representative is not necessary for the validity of their declaration of consent.

8. Contact

Should you have any question, proposal or complaint, please contact MTK Budapest at the e-mail address provided in the Contact details menu and/or at any of the contact details provided below.

Should you have any questions not clearly answered by this Notice, please contact us.

9. Data Controllers

Joint data controllers in regard of the MTK Budapest Newsletter:

1. **MTK Budapest Labdarúgó Zártkörűen Működő Részvénytársaság** (registered office: H-1087 Budapest, Salgótarjáni út 12-14; company registration number: 01-10-046130; tax number: 14424955-2-42)

Data controller with regard to the Webshop:

1. **MTK Budapest Labdarúgó Zártkörűen Működő Részvénytársaság** (registered office: H-1087 Budapest, Salgótarjáni út 12-14; company registration number: 01-10-046130; tax number: 14424955-2-42)

Contact details of the Data Controllers:

Phone: +36709027809

E-mail: shop@mtkbudapest.hu