

The Privacy Policy of the Hungarian Academy of Sciences and of the Secretariat of the Hungarian Academy of Sciences¹

I Designation of the Data Controller

Hungarian Academy of Sciences (MTA)

Registered seat: 1051 Budapest, Széchenyi István tér 9.

Postal address: 1245 Budapest, Pf. 1000

E-mail: info@titkarsag.mta.hu

Phone: +36 (1) 411-6100

Website: www.mta.hu

Secretariat of the Hungarian Academy of Sciences (Secretariat of MTA)

Registered seat: 1051 Budapest, Nádor u. 7.

Postal address: 1245 Budapest, Pf. 1000

E-mail: info@titkarsag.mta.hu

Phone: +36 (1) 411-6100

Website: www.mta.hu

The legal basis of joint processing:

MTA and the Secretariat of MTA are joint controllers.

Section 19 of the Act XL of 1994 on the Hungarian Academy of Sciences (hereinafter referred to as “MTA Act”) provides that the Secretariat of MTA is a central budgetary body constituted by a public association, having an economic entity of its own responsible for managing the duties of the Academy as a public association, and for performing the administrative, business management, financial, asset management and supervisory duties of the Academy’s institutions. Based on the law, the Secretariat of MTA is the controller of the data of the Academy as a public association.

II Legislation constituting the legal grounds for data processing

1 The main pieces of legislation governing the acts of data processing are the following:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 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, and repealing Directive 95/46/EC (General Data Protection Regulation):
<https://www.adatvedelmirendelet.hu/wp-content/uploads/2016/07/CELEX3A32016R06793AHU3ATXT.pdf>
- Act LXVI of 1995 on authentic instruments, public archives and on the protection of documents in private archives (the version of the act currently in force is available here: <https://net.jogtar.hu/jogszabaly?docid=99500066.TV>)
- Government Decree 335/2005 (XII.29) on the general requirements related to document management performed by bodies entrusted with public duties (the version of the decree currently in force is available here: <https://net.jogtar.hu/jogszabaly?docid=A0500335.KOR>)

¹ Amended on 21 October 2022.

- Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereinafter referred to as “Freedom of Information Act”, the version of the act currently in force is available here: <https://net.jogtar.hu/jogszabaly?docid=A1100112.TV>
- Act XL of 1994 on the Hungarian Academy of Sciences (hereinafter referred to as “MTA Act”), the version of the act currently in force is available here: <https://net.jogtar.hu/jogszabaly?docid=99400040.TV>

2 Definitions

Personal data: means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

For additional definitions the provisions of the GDPR or the Freedom of Information Act shall apply.

III Registers of MTA and of the Secretariat of MTA containing personal data

1 Personal data processed in the MTA Database ‘AAT’

1.1 The scope of processed data and the purpose of processing

Personal data of members of the Academy’s public association	The purpose of processing
Name; name at birth; name used for scientific activities (publications); mother’s name; place and date of birth; permanent residential address; up-to-date contact details (postal or email address) where this is different from the permanent residential address; scientific degree; year of the award of the scientific degree; research field in which the degree is	For MTA to fulfil its statutory obligation to register the members of its public association, they must provide their personal data for their registration in the AAT database as well as for their identification. ² <u>Out of the personal data of the members, the following are freely accessible to the public without any specific consent:</u>

² MTA Act, Section 7(1): Any person holding a scientific degree obtained or recognised in Hungary may join the public association of the Academy as its non-academician member if they, in conducting their scientific work, contribute to the achievements of the Hungarian scientific community and if they notify the Academy's scientific section competent in their field that they wish to be members of the public association. The candidate shall be registered in the central register of the public association on the basis of the proposal of the competent scientific section.

awarded; the scientific section and the scientific committee which the member of MTA's public association has joined	Name; name at birth; name used for scientific activities (publications); scientific degree; year of the award of the scientific degree; research field in which the degree is awarded; the scientific section and the scientific committee which the member of MTA's public association has joined.
Membership or position in one of MTA's bodies; inaugural lecture of a Member of the Academy (title, date and text); nomination for Academy Membership	The position in any of MTA's bodies is registered for the purpose of retrievability and identifiability of scientific achievements and for the purpose of scientific research. These data are recorded and registered automatically by the Managing Department of the Directorate of MTA's Public Association, and these data are available to the public.
Sex; nationality; workplace; workplace address; other address (e.g. temporary residence); membership/position held in any Hungarian or foreign scientific organization; honours and prizes; titles received; editorial work; researcher's own website; professional CV; diplomas (name of university, designation of major, year of award, copy of the document); fields of research; research topics; scientific achievements; portrait photo	The processing is carried out for the purpose of retrievability and identifiability of scientific achievements and for the purpose of scientific research. The provision of these data is subject to the freely given consent of the data subject, the data are not public but may be made public based on the data subject's decision to this effect.

Personal data of Members of the Academy, their widows, widowers and their orphans	The purpose of processing
Data recorded in the AAT database as well as a bank account number; tax identification number; social security identification number; reference number of marriage certificate or death certificate	<p>The data are registered</p> <ul style="list-style-type: none"> - either for the purpose of performance of a task to be carried out under national legislation by a unit of the Secretariat of MTA which is designated as the competent unit for the task under the Bylaws of the organization, - or for the purpose of the payment of any honoraria provided for by national legislation. <p>These data are processed within the AAT database in the form of a separate register by the Managing Department of the Directorate of MTA's Public Association within the Secretariat of MTA, and the competent unit of the Secretariat of MTA / its authorized staff as designated by the Bylaws of the</p>

	organization shall have the right to access these data for the performance of a task provided for in national legislation.
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1.2 The legal basis for the processing in the MTA Database AAT

The processing takes place

- for the purposes of performing tasks carried out in the public interest as provided for in the MTA Act in the case of the following data: name; name at birth; name used for scientific activities (publications); mother's name; place and date of birth; permanent residential address; up-to-date contact details (postal or email address) where this is different from the permanent residential address; bank account number; tax identification number; social security identification number; scientific degree; year of the award of the scientific degree; research field in which the degree is awarded; the scientific section and the scientific committee which the member of MTA's public association has joined; membership or position in one of MTA's bodies; inaugural lecture of a Member of the Academy (title, date and text); nomination for Academy Membership.³ Accordingly, the processing is carried out pursuant to point (e) of Article 6(1) of the GDPR.
- on the basis of freely given consent in the case of the following data: sex; nationality; workplace; workplace address; other address (e.g. temporary residence); membership/position held in any Hungarian or foreign scientific organization; prizes and honours; titles received; editorial work; researcher's own website; professional CV; diplomas (name of university, designation of major, year of award, copy of the document); fields of research; research topics; scientific achievements; portrait photo. Accordingly, the processing is carried out pursuant to point (a) of Article 6(1) of the GDPR.
- with regards to the personal data of Members of the Academy, their widows, widowers and their orphans, the provision of honoraria as well as allowances for family members, that is with regards to the data recorded in the AAT Database as well as bank account numbers, tax identification numbers and social security identification numbers, in order to ensure compliance with a legal obligation.⁴ Accordingly, the processing is carried out pursuant to point (c) of Article 6(1) of the GDPR. The provision of the same data is based on free consent for the purpose of distributing researcher's aid, that is, pursuant to point (a) of Article 6(1) of the GDPR.

1.3. The period for which data are processed in the AAT Database

The Secretariat of MTA shall retain the personal data for as long as the legal basis of processing persists.

³ The public duties of the Academy are listed in Section 3(1) of the MTA Act.

MTA Act, Section 7(1): Any person holding a scientific degree obtained or recognised in Hungary may join the public association of the Academy as its non-academician member if they, in conducting their scientific work, contribute to the achievements of the Hungarian scientific community and if they notify the Academy's scientific section competent in their field that they wish to be members of the public association. The candidate shall be registered in the central register of the public association on the basis of the proposal of the competent scientific section.

⁴ MTA Act, Section 6(4): academician's honorarium.

The Secretariat of MTA shall process the following data until eventual withdrawal of consent by the data subject: sex; nationality; workplace; workplace address; other address (e.g. temporary residence); membership/position held in any Hungarian or foreign scientific organization; prizes and honours; titles received; editorial work; researcher's own website; professional CV; diplomas (name of university, designation of major, year of award, copy of the document); fields of research; research topics; scientific achievements; portrait photo. In the event of a withdrawal of consent the identity of the data subject must be verified.

Data subjects may log in to the AAT Database with a password of their own, and once logged-in, they may modify or supplement their own data. The exercise of the right to erasure is not unconditional. The terms of the exercise of the right to be forgotten are provided for under point 3, Section 2 of Chapter IV.

1.4. Transfer of data

The Secretariat of MTA may transfer the personal data of the members of its public association – [*such as name; up-to-date contact details (postal or email address) where this is different from the permanent residential address; scientific degree; year of the award of the scientific degree; research field in which the degree is awarded; the scientific section and the scientific committee which the member of MTA's public association has joined*] - to an international experts' database or a national experts' database of a foreign country where the data subject has given their consent thereto. Before the transfer is performed, the Secretariat of MTA must verify that the data concerning the data subjects will be treated in accordance with the relevant provisions of the GDPR.

2 Personal data recorded in the course of the procedures of the MTA Doctoral Council

2.1 The scope of processed data and the purpose of processing

Personal data of applicants for the title of Doctor of the Academy	The purpose of processing
Name; name used for scientific activities (publications); place and date of birth; mother's name; residential address; university degree; place and date of award of scientific degree and reference number of the official award documents; e-mail address; phone number; postal address; name, address and phone number of employer; title of the submitted doctoral dissertation; scientific section to which this belongs; scientific domain; MTA identifier	To conduct the doctoral procedure leading to the award of the scientific title, in accordance with the relevant legislative provisions. These data are recorded by the Secretariat of the Doctoral Council operating within the Secretariat of MTA, and the competent unit of the Secretariat of MTA as designated by the latter's Bylaws shall have the right to access these data for the performance of a task provided for in national legislation, with a view to supporting the pursuit of sciences, through the website of MTA.

Personal data of the Doctors of the Academy, the Doctors of Sciences and the Candidates of Science	The purpose of processing
Name; name at birth; name used for scientific activities (publications); place and date of	- To maintain a register in line with the relevant legislative provisions;

birth; mother's name; place and date of award of university diploma and scientific degree and reference numbers of the respective official award documents; e-mail address; phone number; postal address; name, address and phone number of employer; title of the submitted doctoral dissertation; scientific section to which this belongs; scientific domain; bank account number; tax identification number; social security identification number; pensioner identification number; MTA identifier	<ul style="list-style-type: none"> - To pay honoraria as provided for in the relevant legislation. <p>These data are recorded by the Office of the Doctoral Council operating within the Secretariat of MTA, and the competent unit of the Secretariat of MTA as designated by the latter's Bylaws shall have the right to access these data for the performance of a task provided for in national legislation.</p>
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Personal data collected in the course of a procedure of recognition of a scientific degree obtained in a foreign country	The purpose of processing
Name; name at birth; place and date of birth; mother's name; residential address; place and date of award of university diploma and scientific degree and reference numbers of the respective official award documents; e-mail address; phone number; postal address; name, address and phone number of employer; nationality; reference number and period of validity of a permanent or temporary residence permit; title of the submitted doctoral dissertation; scientific section to which this belongs; scientific domain; identification code of an identity card or a passport	<p>To conduct the procedure of recognition.</p> <p>These data shall be recorded by the Secretariat of the Doctoral Council operating within the Secretariat of MTA, and the competent unit of the Secretariat of MTA as designated by the latter's Bylaws shall have the right to access these data for the performance of a task provided for in national legislation.</p>

2.2 The legal basis for processing in procedures conducted by the Doctoral Council

- The legal basis for the processing is the requirement of compliance with a legal obligation to which the controller is subject pursuant to the MTA Act.⁵ The data provided in the application setting off the procedure shall be managed by the Secretariat of MTA. Accordingly, the processing is carried out pursuant to point (c) of Article 6(1) of the GDPR.
- The list of the names of the Doctors of the Academy is published on the website of MTA for the purposes of performing a task carried out in the public interest.⁶ Accordingly, the processing is carried out pursuant to point (e) of Article 6(1) of the GDPR. As regards

⁵ MTA Act, Section 3(1) [The public duties of the Academy shall be as follows:] c) operates a scientific qualification system, within the framework of which it awards the title of Doctor of the Hungarian Academy of Sciences (hereinafter the "Doctor of the Academy"), and the titles of corresponding and full member of the Hungarian Academy of Sciences, and, upon request, evaluates institutions pursuing scientific activities. The rules of awarding titles and of evaluation shall be laid down by the Academy in internal regulations.

⁶ MTA Act, Section 3(1) [The public duties of the Academy shall be as follows:] a) supports the pursuit of sciences and the conduct of scientific research and promotes the publication of scientific books and journals.

the other data related to the Doctors of the Academy, their accessibility is governed by Section 1 of Chapter III ('AAT' Database) above.

2.3 The period for which the data are processed in procedures of the Doctoral Council

The controller shall retain the data under this Section for as long as the legal basis of processing persists.

The complete documentation of any doctoral procedure conducted by MTA shall be stored by the Secretariat of the MTA Doctoral Council in line with the relevant legislation on archiving and with the internal rules of document management, and it shall be subsequently handed over to the Archives of the Academy. Data subjects may request the modification of their data at the e-mail address doktori.tanacs@titkarsag.mta.hu.

3 Personal data processed in procedures of MTA's grant schemes

3.1 The scope of processed data and the purpose of processing

Personal data processed in procedures of MTA's grant schemes	The purpose of processing
<p>Name; place and date of birth; mother's name; nationality; residential address; university diploma; scientific degree or title; scientometric data; e-mail address; contact details; phone number; postal address; name, address and phone number of employer; tax identification number; social security identification number; bank account number; applicant's sex (recorded on the basis of freely given consent by the data subject)</p>	<p>To conduct the procedure of the relevant grant scheme.</p> <p>The data shall be recorded either in the Academy's Uniform Grant Management System ('EPK') or in the online portal of the Bolyai János Research Scholarship (the Bolyai Scheme Portal); in addition, for certain grants or prizes of a smaller scale, the data shall be recorded in the application forms attached to the published call and completed and submitted by the applicants, such as for instance:</p> <ul style="list-style-type: none"> - Isabel and Alfred Bader Grant - Grant for researchers raising children - Grants managed by a department of the Secretariat of MTA. <p>The data provided by the applicants shall be recorded by one of the following competent departments of the Secretariat of MTA: Department of Grant Management, Department of International Relations, Secretariat of Hungarians Living Abroad, Directorate of MTA's Public Association; and the competent unit of the Secretariat of MTA / its authorized staff as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation. The controller may publish the names of the grantees on its website.</p>

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One has to register first in the AAT Database to be able to access and use the Academy’s Uniform Grant Management System (‘EPK’). During the use of the EPK, the personal data are being retrieved from the AAT Database.

The personal data may/will be transferred to the reviewers, evaluation committee or jury members involved in the evaluation procedure of a grant scheme. For grant schemes open to researcher-teachers or master teachers, MTA shall appoint the reviewers, shall prepare a list of those reviewers containing their names and formal contact details and shall forward this list to the Educational Authority (data transfer involving a list of names).

3.2 The legal basis for personal data processing in relation to the grant schemes of MTA

The processing is necessary for the performance of a task carried out in the public interest as specified in the MTA Act.⁷ Accordingly, the processing takes place pursuant to point (e) of Article 6(1) of the GDPR.

3.3 The period for which the data are processed in relation to the grant schemes of MTA

The personal data included in the documentation of applications submitted under the grant schemes shall be stored by the Secretariat of MTA in line with the relevant legislation on archiving and with the internal rules of document management for a period of 15 years, after which period they shall be handed over to the Archives of the Academy. As regards the storage of the complete documentation of applications, the period of storage shall be aligned with the period stipulated for financial reporting. The period of storage of the personal data concerned shall be separately determined in the respective grant calls to comply with the terms of each of the grant schemes. The data subjects may request the modification of their data at either of the following email addresses: kutatasi.palyazat@titkarsag.mta.hu; htmt@titkarsag.mta.hu; kfb@titkarsag.mta.hu; koztestuleti.ig@titkarsag.mta.hu; nkp@titkarsag.mta.hu.

4 Processing related to the establishment of an employment relationship and processing related to issuing of a digital signature certificate

4.1 The scope of processed data and the purpose of processing

Personal data of individuals applying for a job at the Secretariat of MTA	The purpose of processing
Name; place and date of birth; mother’s name; residential address; qualifications; e-mail address; contact details; phone number; postal address; former employers, their addresses and phone numbers; portrait photo; other data included in the CV or in the motivation letter; certificate of clean criminal record	To conduct the open or restricted recruitment procedure in order to establish an employment relationship. The data provided shall be recorded by the Department of Human Resources within the Secretariat of MTA; and the competent unit of the Secretariat of MTA as designated by the Bylaws of the organization shall have the

⁷ MTA Act, Section 3(1) [The public duties of the Academy shall be as follows:] j) organizes scientific events and conferences, publishes calls for applications.

	right to access these data for the performance of a task provided for in national legislation.
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4.2 The legal basis for the processing in relation to the establishment of an employment relationship

In addition to the data subject’s consent, the legal basis shall also include the legitimate interests pursued by the controller in the context of the actions performed as part of the recruitment procedure. In case of a legal dispute arising from the recruitment procedure, the legitimate interests of the recruiting entity shall constitute appropriate legal grounds for the processing. Accordingly, the processing is carried out pursuant to points (a) and (f) of Article 6(1) of the GDPR.

4.3 The period for which the data are processed in relation to the establishment of an employment relationship

Where an employment relationship is established either in the form of appointment as civil servant or in the form of a work contract, the personal data of the data subject, that is the civil servant or the worker, as contained in their CV or in their application documents where there has been a call for application, shall be retained for a period of 50 years in line with the provisions of the internal rules of document management. As regards individuals who have participated in an open call for applications and have not been selected for employment, their personal data shall be retained by the Department of Human Resources within the Secretariat of MTA only if they as data subjects have specifically requested retention of their data by submitting a separate declaration of consent to this effect, in view of the prospect of being considered for a future vacancy notice. Otherwise the officer carrying out the actual processing of the personal data shall delete them once the advertised position has been filled. Section 2 of Chapter IV of this Privacy Policy sets out in detail the rights of the data subject.

4.4 Processing related to issuing of a digital signature certificate

4.5 The scope of processed data and the purpose of processing

Personal data of individuals for whom a digital signature certificate has been issued at MTA or at the Secretariat of MTA	The purpose of processing
Name;	Compliance with a legal obligation set out in the relevant legislative provisions ⁸ . These data shall be recorded by the Department of Legal and Administrative Affairs of the Secretariat of MTA and may be accessed by anyone on the website of MTA (https://mta.hu/) in the context of compliance

⁸ Based on Section 14(1) of the Government Decree 137/2016 (VI. 13.) laying down the requirements in relation to digital signatures and digital stamps for use in public authorities’ digital administrative services, the public authority providing digital administrative services shall, in line with the rules of digital information, disclose the name of the natural person authorized to issue documents on its behalf.

	with a legal obligation set out in the relevant legislative provisions.
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4.6 The legal basis for the processing related to the digital signature certificate

The legal basis for the processing is the requirement to comply with a legal obligation to which the controller is subject, as set out in the relevant legislative provisions. Accordingly, the processing is carried out pursuant to point (c) of Article 6(1) of the GDPR.

4.7 The period for which the data are processed in relation to the digital signature certificate

The controller shall retain the data falling within the scope of this Section for as long as the legal basis for their retention persists and shall make them available on its website for a period of 10 years following the withdrawal or expiry of the validity of the certificate⁹.

In line with the relevant legislation on archiving and with the internal rules of document management, the controller shall transmit the documentation concerning the digital signature certificate to the Archives of the Academy.

5 Data processing related to a contractual relationship

5.1 The scope of processed data and the purpose of processing

Personal data of individuals entering into a contractual relationship with the Secretariat of MTA	The purpose of processing
Name; place and date of birth; mother's name; residential address; tax identification number; VAT number; social security identification number; email address; contact details; phone number; postal address; identification number of business operator's licence; bank account number; for contracts on property: nationality and personal identification number	Performance of the contract. These data shall be recorded by the Secretariat of MTA; and the competent unit of the Secretariat of MTA as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation.

5.2 The legal basis for the processing related to the establishment of a contractual relationship

The legal basis for the processing is the performance of the contract that has been concluded with the data subject. Accordingly, the processing is carried out pursuant to point (b) of Article 6(1) of the GDPR.

⁹ As provided for in Section 13(7) of the Government Decree 137/2016 (VI. 13.) laying down the requirements in relation to digital signatures and digital stamps for use in public authorities' digital administrative services: (7) The data specified in points b) and c) of paragraph (5) shall be made available on the website for a period of 10 years following the expiry of the validity of the certificate.

The contact persons' data are processed on the basis of the legitimate interests pursued by the controller. Accordingly, the processing is carried out pursuant to point (f) of Article 6(1) of the GDPR.

5.3 The period for which the data are processed in relation to the establishment of a contractual relationship

The personal data of the data subject who is party to the contract in question shall be stored by the Secretariat of MTA in line with the internal rules of document management for a period of 15 years, which should be aligned with the period stipulated for financial reporting, and they shall subsequently be handed over to the Archives of the Academy.

5.4 The scope of data processed in the course of the acknowledgement of donations and the purpose of such processing

Personal data processed in the course of the acknowledgement of donations made to the Academy	The purpose of processing
Name; nationality; place and date of birth; mother's name; residential address; email address; contact details; phone number; postal address;	<p>To acknowledge receipt of the donations made by the donor. The acknowledgement shall take the form of a donation agreement and a deed of foundation of a prize.</p> <p>These data shall be recorded by the Secretariat of MTA; and the competent unit of the Secretariat of MTA / its authorized staff as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation.</p>

5.5 The legal basis for the processing in relation to the acknowledgement of donations

- Data processing carried out within the framework of a donation agreement shall be based on the performance of the contract. Accordingly, the processing takes place pursuant to point (b) of Article 6(1) of the GDPR.
- Data processing for the purposes of indicating the donor's name shall be based on the data subject's specific consent. Accordingly, the processing takes place pursuant to point (a) of Article 6(1) of the GDPR.

5.6 The period for which the data are processed in relation to the acknowledgement of donations

- The personal data of the data subjects who are parties to the contract in question shall be stored by the Secretariat of MTA in line with the internal rules of document management for a period of 15 years, and they shall subsequently be handed over to the Archives of the Academy.
- Any processing which is carried out based on a data subject's consent shall take place until eventual withdrawal of this consent.

6 Data processing related to the award of MTA prizes and prizes awarded by the State

6.1 The scope of processed data and the purpose of processing

Personal data of the awardees	The purpose of processing
Name; nationality; place and date of birth; mother's name; residential address; university diploma; scientific degree; email address; contact details; phone number; postal address; name of employer, and, where relevant, the starting date of the employment; position; address and phone number of employer; scientific section to which the awardee belongs; scientific domain; previous honours received; in addition: tax identification number, social security identification number, bank account number where payment is being made	<p>To conduct the procedure for the nomination for and the award of MTA's prizes or State prizes.</p> <p>These data shall be recorded by the Department of Human Resources or the Directorate of MTA's Public Association within the Secretariat of MTA; and the competent unit of the Secretariat of MTA as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation. The data of the awardees shall be published on the controller's website.</p>

6.2 The legal basis for the processing of personal data in relation to MTA's prizes and State prizes

The legal basis for the processing is the requirement to comply with a legal obligation to which the controller is subject, as set out in the MTA Act and other legislation¹⁰. The data provided in the application launching the nomination procedure shall be processed by the Secretariat of MTA. Accordingly, the processing takes place pursuant to point (c) of Article 6(1) of the GDPR.

6.3 The period for which the data are processed in relation to the administrative duties concerning the award of MTA's prizes and State prizes

The controller shall retain the data falling under the scope of this Section for as long as the legal basis for their retention persists. The data of nominees who will finally have not been awarded the prize in question shall be deleted by the controller immediately after the award procedure ended.

The complete documentation related to the award of the prize in question shall be stored by the Secretariat of MTA in line with the relevant legislation on archiving and with the internal rules of document management for a period of 15 years, and it shall be subsequently handed over to the Archives of the Academy. Data subjects may request the modification of their data at the e-mail addresses humanpol@titkarsag.mta.hu or koztestuleti.ig@titkarsag.mta.hu.

7 Personal data processed in the course of the organization of conferences and other events, or in the course of the issuing of publications

7.1 The scope of the processed data and the purpose of processing

¹⁰ The rules of the procedure for the award of State prizes and the legal basis for the corresponding data processing are set out in the Act CCII of 2011 on the use of the coat of arms and national flag of Hungary as well as on State honours, and in the Act XII of 1990 on the Kossuth Prize and the Széchenyi Prize.

Where an event or a scientific conference is being held, the name and email address of its voluntarily registered participants shall be stored by the competent unit (Department of Communications or Directorate of MTA's Public Association) of the Secretariat of MTA as designated by the Bylaws of the organization. The purpose of the processing is to provide registered participants as well as journalists and press contacts with updates on issues of indirect or direct relevance to MTA, and also, to ensure there are means to reach out to them. In order to enable accurate reporting to the public, at conferences or other events there may be photographs taken and audio or video recordings made, which may feature in published information material or may be uploaded to online photo or video sharing platforms; furthermore, certain events may include a certificate handover ceremony, which involves indication of the name of an individual who is considered to be a data subject. Certificates are handed over by the Secretariat of MTA in recognition and support of scientific achievements. Speakers at events are also photographed and audio or video recording is produced about their lectures, which will then be made available to the public at online photo and video sharing platforms for general information.

7.2 The legal basis for the processing of personal data in relation to the organization of conferences

The legal basis of processing shall be:

- the data subject's consent: when data are collected for the purposes of setting up a mailing list or database; that is, pursuant to point (a) of Article 6(1) of the GDPR.
- the controller's legitimate interests in the case of the production, by MTA or other controllers, of photographs, audio or video recordings (representing lecturers and members of audience alike), as well as their disclosure:
 - o on social media channels (YouTube channel, Facebook account, Flickr gallery, podcasts on iTunes and Soundcloud, hereinafter referred to as "Social media channels")
 - o publications: Almanac of the Hungarian Academy of Sciences, that is, pursuant to point (f) of Article 6(1) of the GDPR.
- performance of a task carried out in the public interest: in the case of the Secretariat of MTA giving updates on issues of indirect or direct relevance to MTA, as well as in the case of certificate handover ceremonies; that is, pursuant to point (e) of Article 6(1) of the GDPR.

7.3 The period for which the personal data are processed in relation to the organization of conferences

Where a data subject would no longer wish to remain on the mailing list maintained by the Secretariat of MTA for the distribution of invitations to MTA's conferences and other events, they should send a message to info@titkarsag.mta.hu requesting their removal from the mailing list. Where a journalist or press contact person who is a data subject would no longer wish to receive any press briefings, they should send a message to sajto@titkarsag.mta.hu requesting their removal from the press contacts' mailing list.

In the case of events where attendance is subject to registration, the list of registered participants shall only be processed for as long as necessary to comply with financial reporting rules. Data provided on attendance sheets completed on site shall also be processed for a period not longer than what is required for financial reporting, where such data is to be used for the financial reporting concerned. Data subjects wishing to continue to receive invitations to future events

shall have the possibility to signal this intention to the unit which is the conference organizer by giving their specific and explicit consent to the retention of their name and email address. In the case of the issuing of certificates, the period of processing shall be three years. In the case of photographs taken or audio or video recordings made at conferences or public lectures, the processing shall take place for so long as a data subject featuring on a photograph or on an audio or video recording has not exercised their right to object in terms of this processing.

7.4 Processors

The Secretariat of MTA relies on a processor for the issuing of certificates: an agreement with a print company has been concluded to this effect.

The name and contact details of the print company: Printorg Produkció Kft., registered seat: 1118 Budapest, Rahó utca 16.

For the purposes of the release of photographs and audio or video recordings the operators of the social media channels shall be considered as processors.

8 Personal data processed in the course of the organization of international conferences

8.1 The scope of processed data and the purpose of the processing

For the purposes of organizing an international conference, the names and email addresses of those who voluntarily register to the event as participants shall be stored by the Department of International Relations within the Secretariat of MTA, or by another unit designated as organizer in the invitation notice. Participants who have registered and thereby become data subjects will be regularly informed by the Secretariat of MTA of the Academy's upcoming international conferences.

8.2 The legal basis for the processing in relation to the organization of international conferences

The legal basis for the processing of the personal data shall be the consent given by the data subject. Accordingly, the processing is carried out pursuant to point (a) of Article 6(1) of the GDPR.

8.3 The period for which the data are processed in relation to the organization of international conferences

Data subjects' data shall be processed until eventual withdrawal of their consent. A data subject may request at any time the deletion or modification of their data by sending a message to nemzetkozi@titkarsag.mta.hu. Where a conference invitation notice contains another email address, the request for deletion or modification may be sent to that address as well.

9 Processing of personal data of persons submitting a request for access to data of public interest

The Hungarian Academy of Sciences and the Secretariat of MTA shall receive requests for access to data of public interest through the latter's Department of Communications.

Competent unit:
Department of Communications

Address: 1051 Budapest, Széchenyi István tér 9.; Phone: +36-1/411-6321
E-mail: info@titkarsag.mta.hu

9.1 The scope of the processed data and the purpose of processing

Data required for a request:

Personal data of the person submitting the request for access to data of public interest	The purpose of processing
Surname and first name; email address; postal address	To comply with the relevant legal obligation to which the controller is subject, as laid down in the relevant legislative provisions. The person submitting the request may refuse to give his or her name, but in that case the Secretariat of MTA may refuse to act on the data request. ¹¹

9.2 The legal basis for the processing in relation to the person submitting the request for access to data of public interest

The legal basis shall be the legal obligation to which the controller is subject, as laid down in the relevant law. Accordingly, the processing is carried out pursuant to point (c) of Article 6(1) of the GDPR.

9.3 The period for which the data are processed in relation to the person submitting the request for access to data of public interest

The personal data shall be stored by the Secretariat of MTA in line with the relevant legislation on archiving and with the internal rules of document management.

10 Processing of certain personal data collected from research-performing institutions

10.1 The scope of the processed data and the purpose of processing

The Secretariat of MTA may collect data from research-performing institutions for compliance with a legal obligation laid down by law¹². The collected data shall be used for the purposes of

¹¹ Freedom of Information Act, Section 29(1b): The organ performing public duties that processes the data in question shall not be obliged to comply with the data request if the requesting party does not indicate his or her name or, for a requesting party other than a natural person, its designation, or the contact information through which the requesting party can be provided with any information and notification in connection with the data request.

¹² MTA Act, Section 3(1) [The public duties of the Academy shall be as follows:] c) operates a scientific qualification system, within the framework of which it awards the title of Doctor of the Hungarian Academy of Sciences (hereinafter the "Doctor of the Academy"), and the titles of corresponding and full member of the Hungarian Academy of Sciences, and, upon request, evaluates institutions pursuing scientific activities. The rules of awarding titles and of evaluation shall be laid down by the Academy in internal regulations.

compliance with legal obligations, such as the submission of a report to the Parliament, or a briefing to the Government.¹³

10.2 The legal basis for processing certain personal data collected from research-performing institutions

The legal basis of the processing shall be the legal obligation to which the controller is subject, as laid down in the relevant law. Accordingly, the processing is carried out pursuant to point (c) of Article 6(1) of the GDPR.

10.3 The period for which the data collected from research-performing institutions are processed

The personal data shall be stored by the Secretariat of MTA in line with the relevant legislation on archiving and with the internal rules of document management.

11 Processing of certain personal data collected from MTA’s own central budgetary bodies

11.1 The scope of the processed data and the purpose of processing

Personal data processed in the course of acts of controlling or financial supervision	The purpose of processing
Name, position, date of birth, mother’s name, bank account number, residential address, qualifications (educational background), depending on the type of review	<p>In pursuing the task of overseeing and coordinating the controlling activities and financial management activities of central budgetary bodies coming under the control or supervision of the Academy, the Secretariat of MTA is entitled to process, for the purposes of compliance with a legal obligation laid down in legislation¹⁴ or in its own internal rules, the personal data held by central budgetary bodies coming under the Academy’s control or supervision, which data are recorded in the documentation produced in the course of the relevant procedure of overseeing or coordination.</p> <p>These data shall be recorded by the Department of Controlling and the Directorate of Finance within the Secretariat of MTA; and the competent unit of the</p>

¹³ MTA Act, Section 3(2) Every two years, the President of the Academy reports to Parliament on the work of the Academy, and to this end the President regularly assesses and evaluates the performance of each scientific discipline in Hungary and their reputation on an international level.

Section 3(3) The President of the Academy informs the Government every year about the work of the Academy and its achievements in stimulating Hungarian society and economy.

¹⁴ MTA Act, Section 19(1) The Secretariat of MTA is a central budgetary body constituted by a public association, having an economic entity of its own responsible for managing the duties of the Academy as a public association, and for performing the administrative, business management, financial, asset management and supervisory duties of the Academy’s institutions.

	Secretariat of MTA / its authorized staff as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation.
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11.2 The legal basis for the processing

The legal basis shall be the requirement to comply with a legal obligation laid down in legislation such as in particular the provisions concerning controlling officers in Section 70 (1) (a) of the Act CXCV of 2011 on public finances, and the Government Decree 370/2011 (XII.31.) on the controlling system and controlling activities of central budgetary bodies. Accordingly, the processing is carried out pursuant to point (c) of Article 6(1) of the GDPR.

11.3 The period for which the data are processed

The controller shall retain the data falling within the scope of this Section for as long as the legal basis for their retention persists and shall store them as long as it is necessary for financial reporting purposes.

12 Science prizewinner's allowance

12.1 The scope of the processed data and the purpose of processing

Personal data processed in the course of the calculation and remittance of the science prize winner's allowance	The purpose of processing
Name; nationality; place and date of birth; mother's name; tax identification number; social security identification number; permanent residential address; postal address; email address; phone number; name of bank where current account is held; bank account number; date of award of the Széchenyi Prize	<p>The purpose shall be to calculate, arrange for the payment of, and conduct the procedure leading to the establishment of the science prizewinner's allowance, in order to comply with the relevant statutory obligation.</p> <p>The purpose also includes the performance of duties in fiscal and social security administration.</p> <p>These data shall be recorded by the Directorate of Finance within the Secretariat of MTA; and the competent unit of the Secretariat of MTA as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation.</p>

12.2 The legal basis for the processing

The legal basis for the processing of the personal data related to the calculation and remittance of the science prizewinner's allowance is the performance of a task carried out in the public

interest as provided for by law¹⁵. Accordingly, the processing takes place pursuant to point (e) of Article 6(1) of the GDPR.

12.3 The period for which the data are processed

The controller shall retain the data falling within the scope of this Section for as long as the legal basis for their retention persists and shall store them as long as it is necessary for financial reporting purposes.

13 The scope of personal data processed in relation to research integrity and ethics cases and the purpose of the processing

Personal data processed in research integrity and ethics cases	The purpose of processing
Name; residential address; office email address; phone number	The purpose shall be to conduct a procedure set out in the Science Ethics Code of the Hungarian Academy of Sciences. These data shall be recorded by the Department of Legal and Administrative Affairs within the Secretariat of MTA; and the competent unit of the Secretariat of MTA as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation.

13.1 The legal basis for the processing of personal data in research integrity and ethics cases

The legal basis shall be the performance of a task carried out in the public interest as laid down in the MTA Act.¹⁶ Accordingly, the processing takes place pursuant to point (e) of Article 6(1) of the GDPR.

13.2 The period for which the data are processed in relation to research integrity and ethics cases

The documents of research integrity and ethics cases shall be filed, managed and archived separately from the documents of the Department of Legal and Administrative Affairs; the documents belonging to the Science Ethics Committee may not be disposed of.

14 Processing of personal data for the support of the activities of Hungarian Science Abroad or for provision of aid on an individual basis

14.1 The scope of the processed data and the purpose of processing

¹⁵ Act XII of 1990 on the Kossuth Prize and the Széchenyi Prize, Section 7/B.

¹⁶ MTA Act, Section 3 (1) g) [(1) The public duties of the Academy are as follows:] g) it acts as guardian of the integrity of the scientific community as well as of the freedom of research and of the academic freedom of expression.

Personal data processed in the course of conclusion of a contract	The purpose of processing
<p>For the contracting party or the contact person given in the contract: name; nationality; place and date of birth; mother's name; residential address; university degree; scientific degree; email address; contact details; phone number; postal address; name of employer and, where applicable, starting dates of employment relationships; positions; address and phone number of employer; scientific section, scientific domain; former honours</p>	<p>The purpose shall be to carry out the preparatory work for agreements between the MTA and legal and natural persons, as well as to maintain contact with the Academy's External Members and the external members of the Academy's public association in order to reinforce their engagement with the Hungarian scientific community, and to arrange for and promote the conditions enabling this; in addition, the purpose shall be to cooperate with circles of researchers belonging to the Hungarian diaspora, to provide support to these circles, to reach out to the Academy's partner institutions and to advocate the Academy's programme for researchers of the Hungarian diaspora. These data shall be recorded by the Secretariat of Hungarians Living Abroad within the Secretariat of MTA; and the competent unit of the Secretariat of MTA as designated by the Bylaws of the organization shall have the right to access these data for the performance of a task provided for in national legislation.</p>

Personal data processed for outreach purposes	The purpose of processing
<p>Name; email address; phone number</p>	<p>The purpose shall be to reach out to and maintain contact with researchers living abroad who are being engaged in research topics of Hungarian relevance or research conducted in Hungarian language, as well as to provide support to the scientific community of the Hungarian diaspora. These data shall be processed by the Secretariat of Hungarians Living Abroad within the Secretariat of MTA.</p>

Personal data processed for the provision of aid	The purpose of processing
<p>Name; nationality; place and date of birth</p>	<p>The purpose shall be to examine whether individuals who had had contact with the Hungarian Academy of Sciences before and who have fled their home due to the Russia-Ukraine war started in 2022 are in need of aid which can be provided by the Academy.</p>

	These data shall be processed by the Secretariat of Hungarians Living Abroad within the Secretariat of MTA based on the consent of the data subject.
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14.2 The legal basis for the processing

- Processing in this context shall be necessary for the performance of a task in the public interest. Pursuant to points h) and i) of Section 3(1) the MTA Act, the Academy maintains relations with domestic, foreign and international scientific institutions and organisations; reaches out to and maintain contact with researchers living abroad who are being engaged in research topics of Hungarian relevance or research conducted in Hungarian language, as well as it provides support to the scientific community of the Hungarian diaspora. Accordingly, the processing takes place pursuant to point (e) of Article 6(1) of the GDPR.
- In the course of the conclusion of a contract the processing takes place for the performance of the contract. Accordingly, the processing is carried out pursuant to point (b) of Article 6(1) of the GDPR.
As regards the processing of personal data concerning the contact persons, it is based on MTA's legitimate interests, therefore, the processing is carried out pursuant to point (f) of Article 6(1) of the GDPR.

14.3 The period for which the data are processed

- Where the processing is based on consent, it shall continue until the eventual withdrawal of this consent;
- Where the processing is based on the requirement to perform a task in the public interest, it shall continue for as long as the legal basis persists, and as long as storage is necessary for financial reporting purposes.

IV General provisions on data processing

1 Access to personal data and data security measures

1.1 Access to data and transfer of data

The personal data provided by the data subject shall be accessible to the civil servants and workers of the Secretariat of MTA exclusively for the performance of their duties. The officers of the Secretariat of MTA shall, for instance, have access in the course of a procedure conducted by them to those personal data of the data subject which may be disclosed to them in line with the relevant legislation and internal rules.

MTA or the Secretariat of MTA shall transmit the personal data of the data subject to a recipient only in exceptional circumstances, where a formal request for transmission has been formulated or where it is necessary to comply with the terms of a contract or statutes or a supervisory decision. Such cases include in particular:

- where in complying with the relevant legislation on archiving and the internal rules of document management the Secretariat of MTA transmits a case file containing personal data of the data subject to the Archives of the Academy, operated by the Library and Information Centre of MTA, which is a central budgetary body,

- where proceedings are initiated before a court or a public authority in a case concerning the data subject and the court seized should have access to documents containing the personal data concerning the data subject, where the court or the public authority issues an order for the transmission of the personal data.

Where there is a legal obligation stipulated in legislative provisions and the relevant conditions are met, the Secretariat of MTA shall be obliged to transmit the personal data as requested.

1.2 Data security measures

The Secretariat of MTA shall store the personal data concerning the data subject on servers which are located at the registered seat of the Secretariat of MTA (1051 Budapest, Nádor utca 7.) and in the Palace of MTA (1051 Budapest, Széchenyi István tér 9). Apart from the Secretariat of MTA, the following companies shall have contractual access to the personal data stored by electronic means:

- Computrend Kft (address: 1117 Budapest, Fehérvári út 84/A.)
- Andrews Kft (address: 1139 Budapest, Petneházy utca 50-52.)
- SDA DMS Zrt (address: 1117 Budapest, Hauszmann Alajos u. 3/b.9)
- Open IT Számítástechnikai Tanácsadó Korlátolt Felelősségű Társaság (address: 1051 Budapest, Szent István tér 11., B épület, VI/18.)
- Abesse Informatikai Tanácsadó Zrt (address: 1118 Budapest, Rétköz u. 7.)
- Netrix Számítástechnikai és Informatikai Kft (address: 1055 Budapest, Falk Miksa utca 12. fe. 2.)
- Google Workspace - Google Cloud EMEA Limited (Velasco Clanwilliam Place Dublin 2 Ireland Adószám: IE3668997OH)
- Mailchimp - c/o The Rocket Science Group, LLC (675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 Tax ID: MOSS No. EU372008134WIX)
- Wix.com LTD (Yunitsman 5 Tel Aviv Israel VAT ID : EU442008451)

Certain personal data stored may be accessed by the following entities on the basis of a supervisory decision or a contract:

- Library and Information Centre of MTA, Archives of the Academy (address: 1051 Budapest, Arany János utca 1.)
- MTA Asset Management Centre (address: 1112 Budapest, Budaörsi út 45.)
- SBGK Attorneys at Law (address: 1062 Budapest, Andrássy út 113.), acting in its capacity as Data Protection Officer
- DJK Consulting Tanácsadó és Szolgáltató Betéti Társaság (address: 1037 Budapest, Zúzmara köz 3.).

The Secretariat of MTA shall take appropriate measures to ensure that personal data are safeguarded, among other things, against unauthorized disclosure or unauthorized alteration. The Secretariat of MTA operates a logging system to record instances of access to the data stored on its file servers, allowing it to monitor at all times who has accessed what kind of data at what time. The controller shall have in place internal rules to govern hard copy document management, enabling the tracking of the flow of document files.

The Secretariat of MTA shall process – that is, store in its IT system – technical data qualifying as personal data which are generated by automated means when a person visits the website of

MTA via internet connection and which concern the following information: the type of the internet browser used, the client IP address, the domain name (URL), the request date/time and the list of pages requested (log data).

The purpose of the processing shall be to collect statistical information with a view to improving the performance of the website and conducting analyses of the number of visitors and the types of use (statistical purposes), as well as to prevent eventual instances of abuse and to enable their detection (information security purposes).

The log data related to the visits of the website of MTA shall be stored by the Secretariat of MTA for one year for statistical purposes, and for two years for information security purposes.

2 Rights of the data subject

2.1 Right to information

The data subject shall have the right to obtain in writing from the Secretariat of MTA as joint controller, through the contact channels given in Chapter I above, information as to:

- the categories of his or her personal data that are being processed,
- the legal basis of the processing,
- the purposes of the processing,
- the source of the data,
- the period for which the data are being processed,
- the recipients to whom the personal data have been disclosed, the time of the disclosure, the references to the relevant pieces of legislation constituting the legal grounds for the disclosure, the categories of data being disclosed, and if a transfer of data has taken place, the recipients to whom the data have been transferred.

The data subject shall have the right to obtain a copy of their personal data undergoing processing: the Secretariat of MTA shall provide the copy within 25 days of the verification of the requesting party's identity.

Where the data subject makes the request by electronic means, the reply shall be provided in electronic form, unless requested otherwise by the data subject. An electronic request for a copy of personal data may also be submitted via the E-Administration Portal “**MTATitkKom**” (the E-Administration Portal of the Department of Communications of the Secretariat of MTA).

Any email address provided by the data subject in any matter does not need to contain any personal data. Thus, it is not necessary for an email address to contain the name of the data subject. The data subject may freely decide whether or not to provide an email address which contains any information about their identity.

2.2 Right to rectification

The data subject shall have the right to obtain in writing, also through the contact channels given in Chapter I above, from the Secretariat of MTA the rectification or the modification of any of the personal data concerning them (for instance, the data subject may at any time modify their email address or postal address). A modification of data which appear in a register of a public authority shall be subject to presentation of an official certificate or warrant.

2.3 Right to erasure (“right to be forgotten”)

The data subject shall have the right to obtain in writing, through the contact channels given in Chapter I above, from the Secretariat of MTA the erasure of personal data concerning them. As the exercise of the right to erasure is not unconditional, it must be justified and be in compliance with the relevant legislative provisions. Where a request for erasure has been submitted, the Secretariat of MTA shall, after verifying the identity (the eligibility) of the data subject, verify the legal basis of the processing.

The personal data shall be erased where:

- their processing has been unlawful;
- their processing has been incomplete or inaccurate – and this cannot be lawfully remedied – provided that erasure is not precluded by law;
- the purpose of the processing is no longer there, or the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the period of storage specified by law in relation to the data has expired;
- the erasure of the processed data has been ordered by a court or a public authority;
- the data subject withdraws their consent on which the processing is based and there is no other legal ground for the processing;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been processed for direct marketing purposes, or they have been collected in relation to the offer of information society services.

The Secretariat of MTA shall refuse to act on the request for erasure where legislative provisions or provisions of internal rules stipulate that the Secretariat of MTA should continue to store the data in question. Thus, it shall, in particular, refuse to act on the request where:

- the processing of personal data is necessary for the purpose of enforcing legal claims or submitting financial reporting to a public authority,
- the processing of personal data may continue for the purposes of complying with a legal obligation or for the purposes of the justified legitimate interests pursued by the controller.

Where there is no provision to prevent the controller from acting on the request for erasure, the Secretariat of MTA shall erase the requested data within 30 days and shall inform the data subject thereof in a letter sent to the address given by the data subject.

Following the erasure, the controller shall call on each recipient to whom the personal data have been disclosed by the MTA or the Secretariat of MTA according to their data transmission records to carry out the erasure of the same data.

Where the processing of personal data is based on freely given consent, such consent must be explicit, documented and its withdrawal must be made possible in the same form as it has been given.

2.4 Right to object

The data subject shall have the right to object to processing of personal data concerning them where one of the following applies:

- the processing or the transmission of personal data are only necessary for the purposes of enforcing the rights or legitimate interests of the controller or of the recipient to whom the data have been disclosed, except where the processing is required by law;
- the personal data are used or transmitted for the purposes of direct marketing, or conducting public opinion polls or scientific research;
- the processing is carried out for purposes other than those for which the personal data were initially collected;
- the exercise of the right to object is in any case made possible by law.

The controller shall process the request, while simultaneously suspending the processing, within 15 days from the receipt of the request and shall communicate its decision to the requesting party in writing. Where the request is justified, the processing must be terminated and the measures taken to honour the exercise of the right to object must be communicated to each recipient to whom the controller has transmitted the data concerned by the right to object.

Where the controller wishes to carry out the processing for purposes other than those which were initially communicated, it must inform the data subject thereof beforehand.

2.5 Right to restriction of processing

The data subject shall have the right to obtain in writing from the controller restriction of processing where, for instance, the data subject holds that the processing has been inaccurate or unlawful but the conditions of erasure as provided by law are not met.

3. Enforcement of legal claims related to processing

3.1 The name of the Data Protection Officer of the controller: SBGK Attorneys at Law, dr András György (address: 1062 Budapest, Andrásy út 113; phone: +36-1-391-1400; email address: andras.gyorgy@sbgk.hu); Phone number of the controller: +36- 1 -411- 6322.

3.2 The data subject may lodge a complaint in relation to the processing directly with the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; phone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu; website: <http://www.naih.hu/>).

3.3 The data subject may bring legal proceedings before a civil court against the Secretariat of MTA on grounds of unlawful processing. The competent court shall be a regional court. The data subject may choose to bring the proceedings before the regional court competent according to their place of residence (the full list and contact details of regional courts can be found here: <http://birosag.hu/torvenyszekek>).

Done at Budapest, on 28.01.2025.