



DATA MANAGEMENT POLICY AND CONSENT FOR MARKETING USE OF SUBMITTED ENTRIES

In accordance with Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, and Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation - GDPR), we hereby inform you about the processing of the personal data you provide:

1. Purpose of the Data Management Policy

The organizer and data controller, Oriskó Eszter e.v. (hereinafter: the Organizer, Data Controller), recognizes the contents of this legal statement as binding upon herself. She undertakes to ensure that all data management related to her activities complies with this policy, relevant national laws, and the legal acts of the European Union.

The data protection principles of the Organizer are continuously available at:

- Headquarters: 1154 Budapest, Wesselényi utca 21. fem. 3.

- Office: 1025 Budapest, Csévi u. 6.

The Data Controller reserves the right to modify this notice at any time but will provide timely notice of any such changes.

The Organizer is committed to protecting the personal data of applicants, jury members, and sponsors and considers the right to informational self-determination important. All personal data is treated confidentially and protected through technical and organizational measures.

Data processor involved:

Technical and communication support is provided by Henrietta Orosz (hereinafter: Data Processor), responsible for website operation, email correspondence, and organizing files (photos, videos, etc.) on Google Drive.

2. The data controller information:

Company name: Oriskó Eszter e.v.

Headquarter: 1154. Budapest, Wesselényi utca 21. fem. 3.

Tax nr.: 58360073-1-42

Tel: +36 30 50 30 476

E-mail: eszter.orisko@gmail.com

3. Definitions

In this declaration, the following expressions, words, and terms must be interpreted in accordance with the definitions given below – these definitions apply throughout the entire text of the declaration:

Data file: the entirety of data managed in a single registry.

Data processing: the execution of technical tasks related to data management operations, regardless of the method or tool used to carry them out, or the location of the application, provided that the technical task is performed on the data.

Data processor: a natural or legal person, or an organization without legal personality, who processes data under a contract – including contracts concluded based on legal provisions.

Data management: any operation performed on data, regardless of the procedure applied, or the totality of such operations, especially including collection, recording, organizing, storing, modifying, using, querying, transmitting, publishing, coordinating or linking, blocking, deleting, and destroying data, as well as preventing further use of the data, making photo, sound, or video recordings, and recording physical characteristics suitable for identifying a person (e.g., fingerprint, palm print, DNA sample, iris image).

Data controller: a natural or legal person, or an organization without legal personality, who independently or jointly with others determines the purpose of data management, makes and executes decisions regarding data management (including the tools used), or has them executed by a data processor.

Data marking: assigning an identifier to the data to distinguish it.

Data destruction: complete physical destruction of the data carrier containing the data.

Data transfer: making the data accessible to a specifically defined third party.

Data deletion: rendering the data unrecognizable in a way that restoration is no longer possible.

Data blocking: marking the data with an identifier to limit its further management either permanently or for a specified period.

Data protection incident: unlawful processing or handling of personal data, including in particular unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as accidental destruction or damage.

EEA state: a Member State of the European Union and any other state that is a party to the Agreement on the European Economic Area, as well as any state whose citizens enjoy the same legal status as citizens of EEA states under an international treaty between the EU and a non-EEA state.

Data subject: any natural person who is identified or can be identified – directly or indirectly – based on specific personal data.

Third country: any country that is not an EEA state.

Third party: any natural or legal person, or organization without legal personality, that is not the same as the data subject, the data controller, or the data processor.

Consent: the voluntary and explicit declaration of intent by the data subject, based on adequate information, by which they clearly agree to the processing of personal data relating to them – either entirely or limited to specific operations.

Special categories of personal data: (The definition continues—please send the rest so I can translate it accurately.)

- a) Personal data relating to racial or ethnic origin, nationality, political opinions or party affiliation, religious or other philosophical beliefs, membership in interest representation organizations, or sexual life;
- b) Personal data relating to health, addictions, or criminal records.

The Service Provider does not process special categories of personal data, and such data is not required for the use of the Service Provider's services.

Disclosure to the public: making the data accessible to anyone.

Entry: the unique work submitted by the applicant as part of the competition – in this case, a photo or video – which, under Act LXXVI of 1999 on Copyright, qualifies as an individual, original creation protected by copyright, and whose author (or lawful user) is the applicant.

Applicant: any natural person identified or identifiable – directly or indirectly – based on specific personal data, who applies for the competition and submits an entry by accepting the competition's terms. The applicant declares that they are the author of the submitted entry (e.g., photo, video), or possess appropriate usage rights from the author for the purposes of the competition. The applicant is responsible for ensuring that the entry does not infringe on any third party's copyright or personal rights and assumes full responsibility for the accuracy and lawfulness of the data they provide.

Personal data: any information that can be linked to the data subject – especially the data subject’s name, identification number, and one or more characteristics relating to their physical, physiological, mental, economic, cultural, or social identity – as well as any conclusions drawn from the data that relate to the data subject.

Sponsor: any natural person identified or identifiable – directly or indirectly – based on specific personal data, or a legal entity acting on behalf of such person, who contributes financially or non-financially to the execution, organization, awarding, or communication of the competition. The sponsor agrees not to unfairly influence the competition results and accepts the rules set by the organizers, including obligations related to data protection and confidentiality.

Objection: a statement by the data subject opposing the processing of their personal data and requesting termination of the processing or deletion of the data.

Jury member: a natural person identified or identifiable – directly or indirectly – based on specific personal data, who evaluates the submitted entries based on professional, aesthetic, or other criteria. The jury member acts independently according to the competition’s rules, agrees to the evaluation regulations, and commits to impartiality, compliance with data protection and confidentiality rules, especially regarding the personal data of applicants and the content of entries not yet made public.

4. Legal Basis, Purpose, and Method of Data Processing

The legal basis for data processing is the voluntary consent of the data subject, in accordance with Section 5 (1) a) of the Information Act (Infotv.).

The purpose of data processing is to organize the competition, evaluate the submitted works, grant awards, communicate with participants, and conduct marketing, promotional, administrative, and statistical tasks related to the competition.

By applying and submitting an entry, the applicant — and in the case of jury members and sponsors, by providing their data, accepting a personal invitation, or using the callback function — explicitly and automatically consents to data processing and accepts the terms outlined in this notice.

Consent is always given by voluntarily providing the data or taking steps necessary for processing. Therefore, no separate signature or additional statement is required; the data processing is lawful without them.

Consent covers all data processing related to the competition, particularly for communication, judging, coordinating appearances, and managing sponsor representations.

The purpose of data processing is to ensure access to and lawful use of the information and submitted entries published by the Organizer.

The Organizer processes only the data necessary and suitable for achieving the intended purpose — namely for running the competition, handling marketing activities related to the competition, learning associated information, fulfilling obligations and enforcing rights arising from the contractual relationship with the data subject, as well as for the lawful and secure operation of the competition and protecting the legitimate interests of third parties.

The Data Controller does not use personal data for any purposes other than those stated in this notice. Personal data may only be shared with third parties with the prior informed consent of the data subject.

This provision does not apply to data transfers required by law, court rulings, or binding decisions from other authorities.

The Organizer keeps a registry for the applicants, judges, and sponsors, which serves the purpose of recording their contact details. The individuals listed in the registry are aware of the data, and they have full control over its use. The individual may request the registry at any time, which will only be shown to them and never to a third party. Upon request, the individual's data can be deleted from the registry.

5. Personal data handled

The following personal data will be handled in the registry:

- Name
- Phone number
- E-mail address
- Billing address
- Postal address
- Certificate (proof of professional level)

The Organizer will retain the following during data processing:

Confidentiality: Protects the information so that only authorized individuals can access it.

Integrity: Ensures the accuracy and completeness of the information and the processing method.

Availability: Ensures that when an authorized user needs it, they can access the desired information and have the necessary tools available.

The Data Controller processes personal data in all cases based on law or voluntary consent. In certain cases, the data processing is based on other legal grounds or Article 6 of the regulation in the absence of consent.

6. Legal Basis for Data Processing

Personal data of applicants are collected during registration and stored in the registry, which is kept in a secure location and will only be shown to the individual upon their request, and only to them.

Personal data of judges are collected after accepting the individual invitation and stored in the registry, which is kept in a secure location and will only be shown to the individual upon their request, and only to them.

Personal data of sponsors are collected after accepting the individual invitation and stored in the registry, which is kept in a secure location and will only be shown to the individual upon their request, and only to them.

7. Duration of Data Processing

The processing of personal data provided by the individuals begins upon registration or acceptance of the individual invitation (by giving consent for data processing) and lasts until the consent is withdrawn. Withdrawal of consent results in the immediate deletion of data from the registry.

8. Scope of Persons Who May Access the Data, Data Transfer, Use of Data Processor

The data is processed solely by the data controller alone; there is no data transfer, and no data processor is used

Persons acting on behalf of or in the interest of the data controller are not allowed to disclose the data or transfer it to third parties. The data controller is familiar with the provisions of the privacy statement and acknowledges them as binding.

9. Rights of the Data Subjects

The data subject may request information about the processing of their personal data, as well as request the correction of their personal data, or – except for data processing mandated by law – its deletion, through any contact method of the data controller. Upon the data subject's request, the data controller will provide information about the personal data they process, the purpose of processing, the legal basis, duration, the name, and address (headquarters) of the data processor, and the activities related to data processing, as well as the recipients of the data and the purpose of the transfer. The data controller must provide the information in writing, in an understandable form, free of charge, within the shortest possible time from the submission of the request, but no later than 25 days. If any personal data is inaccurate, the data controller must correct it. The data controller must delete personal data if its processing is unlawful, if the data subject requests it, if the data is incomplete or incorrect – and this situation cannot be legally corrected – provided that the deletion is not excluded by law, if the purpose of processing has ceased, the statutory retention period has expired, or if ordered by the court or the data protection authority. The data may be transferred for the purpose of data processing. Notification may be omitted if, in consideration of the purpose of the data processing, it does not infringe on the legitimate interests of the data subject. The data subject may object to the processing of their personal data if the processing (transfer) of the personal data is necessary solely for the enforcement of the rights or legitimate interests of the data controller or the recipient, unless the data processing is mandated by law, the use or transfer of the personal data is for direct marketing, public opinion polling, or scientific research purposes, or the law otherwise permits the exercise of the right to object.

In case of violation of their rights, the data subject may turn to the court or the data protection authority against the data controller.

For remedies or complaints, the following contact information is available:

Name: National Authority for Data Protection and Freedom of Information

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone: 06-1-391-1400

Fax: 06-1-391-1410

Email: ugyfelszolgalat@naih.hu

Website: naih.hu

10. Marketing Use of the Competition Entries

By applying for the competition, the applicant irrevocably and free of charge consents to the organizer using the submitted entry (photo or video) – in whole or in part – for marketing, promotional, and communication purposes, including online and offline appearances (e.g., social media platforms, advertisements, press materials, publications, websites, etc.). The organizer will always include the applicant's name during the use of the material, in accordance with the provisions of Act LXXVI of 1999 on Copyright.

If the competition entry depicts natural persons – especially in the case of a recording containing a portrait or voice – the applicant explicitly and fully guarantees that the individuals concerned have given written consent for the use of their image or voice in accordance with Section 2:48 of Act V of 2013 on the Civil Code, and that these documented consents are in the possession of the applicant and can be presented at any time upon the organizer’s request.

The applicant agrees to include only those individuals in the entry who have given written consent for such use. The applicant assumes full and exclusive responsibility for ensuring that the competition entry does not infringe the personality, image, or copyright of any third party, and that the submitted material can be legally used for the purposes specified in this section.

