

DATA PROTECTION NOTICE

In this data protection notice, Invitech ICT Services Ltd. publish information in accordance with the provisions of the General Data Protection Regulation (hereinafter referred to as GDPR) on the processing of personal data in connection with the notification of illegal content in the context of Internet intermediary services, the exercise of data subject rights and the available remedies.

1) Information Related to the Data Controllers and the Data Protection Officer

Data Controller: **Invitech ICT Services Ltd.** (hereinafter referred to as **Controller**)

Registered office: 1013 Budapest, Krisztina krt. 39., Hungary

Customer Service email address: corporate@one.hu

Customer Service phone: 1470

Mailing address: 1013 Budapest, Krisztina krt. 39.

Data Protection Officer: **ARB Privacy Kft.**

E-mail: dpo@invitech.hu

Mailing address: 1013 Budapest, Krisztina krt. 39.

2) Rights of Data Subjects

How can data subjects exercise their rights in relation to data processing?

Data subjects may exercise their rights under the GDPR at any time by submitting a request – orally, in writing or electronically – via one of Controller's contact details.

What does the right of access entitle the data subject to?

The data subject has the right to request confirmation at any time that Controller is processing his or her personal data. At any time, the data subject has the right and the opportunity to know what data Controller processes about him or her and under what circumstances and may also request a copy of his or her personal data. A copy of the personal data may be provided to the data subject in a commonly used computer-readable format (PDF/XML) or in a hard copy of the hard copy. The request for a copy is free of charge.

What is the rectification of personal data?

The data subject may request the correction of inaccurate personal data relating to him or her or the completion of incomplete personal data. As long as the data cannot be corrected or supplemented in the absence of additional information, Controller will restrict the processing of the personal data concerned and temporarily suspend the operations carried out on them, with the exception of storage. Exercising the right to rectification in relation to the photographs attached to the notification must not result in the distortion of the data contained in the image or the processing of data that are not accurate.

When can the right to erasure be exercised?

The data subject may request the deletion of personal data concerning him or her if Controller no longer needs them or if the data subject has concerns about the lawfulness of the processing of his or her data. If there is an obligation to delete the personal data, Controller will cease to process the data and will delete or anonymise them.

What is the right to restriction of processing?

The data subject may request the restriction of the processing of personal data relating to him or her if he or she has concerns about the lawfulness of the processing and requests the blocking of the data instead of erasure, or if Controller no longer needs the data but the data subject requires them for the establishment, exercise or defence of legal claims. During the restriction period, Controller will not perform any operations on the personal data, except storage. Unblocking may only take place in exceptional cases, as defined in the GDPR, which Controller will inform the data subject of in advance.

3) Remedy

In case Controller has processed the personal data of data subjects in a way that is incompatible with the applicable legislation, or where it has not complied with a request to exercise the right or has done so in an inadequate manner, the data subject has the right to lodge a complaint with the data protection supervisory authority using the following contact details:

Name: **Hungarian National Authority for Data Protection and Freedom of Information** (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH)
 Registered office: 1055 Budapest, Falk Miksa utca 9-11., Hungary
 E-mail: ugyfelszolgalat@naih.hu
 Customer Service, Phone: +36 30 683 5969, +36 30 549 6838, +36 1 391 1400
 Telefax: +36 1 391 1410
 Mailing address: 1363 Budapest, Pf.: 9., Hungary
 Web: www.naih.hu

4) Notification of Illegal Content

How does Controller process personal data in connection with receiving and investigating notifications?

Controller is required by applicable legal obligations to operate an electronic illegal content reporting system. Personal data relating to the notifier and, where applicable, to the person concerned by the notification (name, contact details, other information and other information necessary for the investigation of the notification) may be provided via an e-mail address (jogellenestartalom@one-in.hu) operated by Controller. Where absolutely necessary to determine whether content is illegal (for example, in the case of intellectual property infringement), Controller may disclose to the necessary extent personal data related to the data subjects.

Controller will process personal data provided to it through the website or the e-mail address for the purposes of receiving and investigating notifications of illegal content, taking action to remove or disable access to the content and informing the notifier thereof. The legal basis for the processing is compliance with legal obligations [Article 6(1)(c) of the GDPR] applicable to Controller under Article 16 of the EU Regulation 2022/2065 (DSA Regulation) and Section 3(1) of Act CIV of 2023 on certain rules on Internet intermediary services.

Controller processes personal data provided to it until the successful conclusion of the action taken in connection with the investigation of the illegal content, or – in order to exercise or defend legal claims related to possible legal remedies – until 2 years after which it will be deleted.

What kind of data processing takes place for reporting purposes?

Once a year, Controller publishes on its website, in a machine-readable format and in an easily accessible manner, a clear, easy-to-understand report on the content moderation carried out by it during the given period, which includes the number of reports submitted through the electronic illegal content reporting system, the basis of the report, the decisions regarding the report, the median time required to make decisions, and the number of times the decision was changed by us. The processing of personal data – concerning the notifier and, where applicable, the person concerned by the notification – necessary for the preparation of the report is carried out based on the fulfilment of our legal obligation according to Article 15(d) of the DSA Regulation [Article 6(1)(c) of the GDPR]. We process the personal data until the anonymous data set required for reporting is generated.

5) Recipients

What data processors does Controller use to operate the illegal content notification system?

Controller uses Microsoft Corporation (One Microsoft Way, Redmond WA, USA 98052) as the provider of the email messaging system (Office 365).

Are there any transfers to third countries?

Personal data may be transferred by Microsoft Ireland Ltd., the provider of the Office 365 mail system, as data processor, to the United States or any other country where Microsoft Corporation, its affiliates

or other data processors operate. Transfers will be made by Microsoft Ireland Ltd. in accordance with Chapter V of the GDPR, using model contracts adopted by the European Commission, with additional technical and organisational measures. Microsoft Corporation provides detailed information on the data transfers and the technical and organisational measures applied in the document "[Data Protection Addendum](#)".