

Data Management Information / Privacy statement of Dr. Dóra Czintner freelance medical translator and interpreter

1. NAME AND DATA OF THE DATA CONTROLLER AND STORAGE PROVIDER:

Name of data controller: Dr. Dóra Czintner Individual Entrepreneur ("EV")

Registered office address: 2013 Pomáz, 57 Illyés Gyula utca.

Mailing address: 1036 Budapest, Árpád Fejedelem útja 69. 1 em. 4 a.

Registration number: 43769683

Tax number: 67162206-1-33

Email address: translation@czintner.com

Website address: <http://www.czintner.com>

Phone number: + 36-70-8666432

Hosting provider and website operator name: ALL-INKL.COM - Neue Medien Münnich

Registered office address: Hauptstraße 68, D-02742 Friedersdorf, Germany

EU Tax Number: DE 212657916

German tax number: 208/251/03091

Email address: info@all-inkl.com

Phone number: + 49-35872-353-10

Fax: + 49-35872-353-30

2. INTRODUCTION

2.1. The data management information is prepared and issued by **dr.Dóra Czintner self-employed medical translator and interpreter ("Data Controller")** in order to inform persons concerned in an appropriate manner about the processing of their data and their rights concerning data processing.

2.2. Dr. Dóra Czintner self-employed medical translator and interpreter process personal data in accordance with the relevant legal provisions, in particular the 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, hereinafter referred to as the GDPR**), Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as the "**Privacy Act**"), as well as other legal provisions and official recommendations concerning data protection.

2.3. The data management information contains details of the data management of natural and legal persons visiting the Data Controller to order **professional translation / professional interpreting services in English and Hungarian**. The medical translator/interpreting can be performed from Hungarian to English or from English to Hungarian.

2.4. Data Controller expresses to be bound by the content of this data management information. Data Controller undertakes that all data processing related to her activities complies with the requirements of the existing legislation.

2.5. In order to comply with data security requirements, Data Controller shall ensure the protection and security of the personal data, in particular events of accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal data transmitted, stored, or otherwise handled.

2.6. Data Controller handles personal data with the voluntary consent of costumers, based on the authorization of law, the fulfillment of a legal obligation, to the extent necessary for the performance of a contract, and in connection with the enforcement of the legitimate interests of the Data Controller.

2.7. Data Controller performs professional translator and interpreter services in Hungarian-English / English-Hungarian languages in Hungary, as an entrepreneur with the education required for the services. In the course of the professional translation services, Data Controller may occasionally request the assistance of a native English proofreader (as a subcontractor) in connection with texts already translated into English. Data Controller transmits documentation in an anonymised form. Data Controller does not transmit any documents other than the text to be proofread (eg. a scanned copy of the original final report). The Data Controller also maintains an up-to-date record of whether the Data Controller has forwarded a working copy of the requested text to the native-speaker proofreader and, if so, removed or transcribed the personal data from the translation. At the request of the client, the data controller shall provide him or her with written information from this register.

2.8. Data Controller reserves the right to unilaterally change this data management information at any time, the fact of change is properly communicated to the clients, primarily through its website. Information on data management is published on the website medicaltranslation.czintner.com from where the privacy statement can also be downloaded.

2.9. In this Privacy Statement, Data Controller sets out the principles that govern her personal data protection policy and day-to-day practice in requesting personal data from her customers.

In this statement, Data Controller declares for what purposes and how she uses the data obtained with consent, and how she ensures the retention and protection of personal data.

2.10. In preparing the Privacy Statement, Data Controller has taken into account the relevant applicable legislation and the most important international recommendations, in particular, the following:

a) 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 the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, and repealing Regulation (EC) No 95/46 (General Data Protection Regulation)

b) 2011 CXII. Act on the Right to Information Self-Determination and Freedom of Information (Info. Act);

c) Act V. of 2013 - on the Civil Code (Civil Code);

d) ACT CLV. 1997. - on Consumer Protection;

e) Act C. of 2000 - on Accounting (Accounting Act);

2.11. Upon the request of the customers (Data Subjects), Data Controller shall in all cases provide detailed information on the personal data processed, the purpose, legal basis, duration, and activities related to the data processing in accordance with the contents of the request. If you have any questions, please email translation@czintner.com.

Data Controller undertakes that this data management information on the handling and protection of personal data always reflects the principles and actual practice applied by Data Controller.

3. DEFINITIONS

The terms used in the privacy statement are exactly the same terms as used in the General Data Protection Regulation (GDPR) and the Info. Act. Four basic terms are defined by the Info. Act in connection with data management:

3.1. Data management: any operation or set of operations on data, regardless of the procedure used, in particular their collection, recording, systematisation, storage, alteration, use, interrogation, transmission, disclosure, coordination or linking, blocking, erasure and destruction, and prevent further use of the data, take photographs, sound or images and record physical characteristics (eg fingerprints or palm prints, DNA samples, irises) that can be used to identify the person;

3.2. Data Controller: a natural or legal person or an organization without legal personality who, within the framework set by law or a binding act of the European Union, determines, individually or together with others, the purpose of data processing, and make relevant decisions on data processing (including the equipment used) or implement with the data processor;

3.3. Consent of the Data Subject: a voluntary, clear, and well-informed statement of the Data Subject's intention, by means of a statement or other conduct unequivocally expressing his or her will, to consent to the processing of personal data concerning him or her;

3.4. Personal data: any information about the Data Subject; (any information relating to an identified or identifiable natural person ("Data Subject")); a natural person is that who can be identified directly or indirectly, by one or more factors relating to its intellectual, physical, genetic, economic, cultural or social identity.

4. PURPOSE OF DATA MANAGEMENT, DATA INCLUDED

4.1. Data Controller handles personal data only for a pre-determined purpose, in order to exercise a right and fulfill an obligation. She acts fairly and lawfully in the collection and processing of data. In the course of her activities, Data Controller strives to process only such and as much personal data as necessary for the fulfillment of the contracts and the implementation of the provisions, and suitable for achieving the purpose. Data Controller handles the personal data provided only for scope and duration strictly necessary.

4.2. In all cases, the data processing covered by the data management information is related to the performance of professional translation and/or interpreting activities performed by the Data Controller and the provision of these services, which the Data Subject uses, has used, or intends to use.

Data Controller handles the personal data of the Data Subjects in connection with the data processing covered in this statement for the following purposes:

- for contact, communication,
- to carry out professional translation activities,
- professional interpreting services
- to conclude a contract
- for the performance of contracts
- account and receivables management
- to enforce contractual legal claims (eg complaint, warranty claim)
- for document management and archiving after the termination of the contract (performance or termination)
- to create a customer database for your own business
- to provide data to other organizations and authorities specified by law (eg. National Tax and Customs Administration of Hungary (NTCA), Hungarian National Authority for Data Protection and Freedom of Information, court, police). The various authorities may contact my Company for information, disclosure, or provision of documents. In such cases, I must comply with my obligation to provide information, but only to the extent strictly necessary to achieve the purpose of the request.

Data category	Legal basis
1. Natural person's identifiers	contractual basis / consent
2. Specific data (health data)	contractual basis / consent
3. Contact information	contractual legal basis / consent
4. Bank account details	contractual legal basis / consent

4.3. Data controller's data management policies in detail

4.3.1. Professional translation services

Purpose of data management: data management in order to perform **professional translation services**.

Legal basis for data management: Article 6 of GDPR (paragraph 1/b), i.e. the data management is necessary for the performance of a contract to which the Data Subject is a party, or to provide a professional translation at the request of the Data Subject prior to the conclusion of the contract(e.g. translation of a medical report from Hungarian into English).

Scope of data managed

- **identity of the persons:** surname and first name, birth name, place and time of birth, mother's name;
- **other personal data:** citizenship, tax identification number, telephone number, e-mail address, permanent address, mailing address, bank account number, name of the bank holding the account, customer number (customer number, order number), online ID, TAJ, or other health insurance number;
- **special data (health data):** personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person that contains information on the health status of the natural person.

These health data and personal data contained in the medical documentation (e.g. TAJ number) will be available to the Data Controller only in the text to be translated related to the professional translation activity. Data Controller will only know them as part of the text in the

course of her work and will keep them for the duration of the warranty and period of retention.

Source of data: data provision of the Data Subject (customer).

Duration of data management: Data management lasts as long as the claim related to the customer relationship can be enforced, i.e. for 5 years from the termination of the customer relationship, except in the case of termination of the limitation period (performance of the contract pursuant to § 6:58 of the Civil Code).

The period of processing of personal data in respect of the data on the invoice for the service after the termination of the contract is 8 years in accordance with the period of retention in § 169 of Act C of 2000 on Accounting.

Prior to the conclusion of the contract, data management is legally started at the time of the offer, based on the customer's request.

4.3.2. Professional interpretation services

Purpose of data management: data management to perform **professional interpretation services**.

Legal basis for data management: Article 6 of GDPR (paragraph 1/b), i.e. the data management is necessary for the performance of a contract to which the Data Subject is a party, or to provide a professional interpretation at the request of the Data Subject prior to the conclusion of the contract.

Scope of data managed

- **identity of the persons:** surname and first name, birth name, place and time of birth, mother's name.
- **other personal data:** citizenship, tax identification number, telephone number, e-mail address, permanent address, mailing address, bank account number, name of the bank holding the account, customer number (customer number, order number), online ID.
- **special data (health data):** personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person that contains information on the health status of the natural person.

These health data will be available for the Data Controller during the performance of the service related to the professional interpreting activity. They are known only as part of the oral text involved in the interpretation in the course of her work, and they are not preserved or stored after the oral interpretation has been carried out, given that it takes place orally.

Source of data: data provision of the Data Subject (customer).

Duration of data management: Data management lasts as long as the claim related to the customer relationship can be enforced, i.e. for 5 years from the termination of the customer relationship, except in the case of termination of the limitation period (performance of the contract pursuant to § 6:58 of the Civil Code).

The period of processing of personal data in respect of the data on the invoice for the service after the termination of the contract is 8 years in accordance with the period of retention in § 169 of Act C of 2000 on Accounting.

Prior to the conclusion of the contract, data management is legally started at the time of the offer, based on the customer's request.

In the contract concluded with the Data Controller, the Data Subject consents to the management of all personal data which are absolutely necessary for the performance of the professional translation or interpreting activity or service, and are preconditions of the professional translation or interpreting services. The professional translation or interpreting cannot be made without the management of data, so the contract cannot be performed. In the

absence of the consent, or the event of the withdrawal of the consent, the professional translation cannot be made, the professional interpretation service cannot be performed, the contract is impossible.

By signing the data management consent, the Data Subject consents to the data management as specified in the Data Management Information. If the Data Subject gives his / her consent in a special statement, the Data Controller shall provide the Data Subject with full information on the management of the data in connection with the statement.

The Data Subject (customer) automatically consents to the data management by ordering the service offered on the website, and this consent can only be revoked if he/she also cancels his/her order for translation of the document containing personal data. The Data Subject can do this until the execution of the order, i.e. the professional translation of the document or documents, begins. In the absence of revocation, the duration of the data processing in each case involving data processing lasts until the deadline specified in this Data Management Information.

4.3.3. Data managed for all customers

Until the end of the contract and the expiration of the warranty period, I will keep both the document to be translated and the translated document, including any personal data contained therein, as a whole text. This data management is necessary for the performance of the contract and is in the legitimate interest of my business as a Data Controller.

4.3.4. Request a quote and order based on the information on the company's website

I only ask for personal data from visitors of my website if they request a quote from me in order to use my service, before placing their order online.

Purpose of data management: in order to request for a quote or order a professional translation/interpretation. The management of data in order to send the requested quote is therefore the fulfillment of the request initiated by the Data Subject, the necessary contact in connection with it electronically, by telephone, by SMS, or even by postal request.

Legal basis for data management: Article 6 of GDPR (paragraph 1/b), i.e. the Data Subject has consented to the processing of his or her personal data for one or more specific purposes; and / or the data management is necessary for the performance of a contract in which the Data Subject is one of the parties, or the Data Subject request a quote prior to the conclusion of the contract, in order for the Data Subject to decide whether he/she wants to request the service.

Scope of data managed

- **identity of the persons:** surname and first name, birth name, place and time of birth, mother's name.
- **other personal data:** citizenship, tax identification number, telephone number, e-mail address, permanent address, mailing address, bank account number, name of the bank holding the account, customer number (customer number, order number), online ID, TAJ, or other health insurance number;
- **special data (health data):** personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person that contains information on the health status of the natural person.

These health data and personal data contained in the medical documentation (e.g. TAJ number) will be available to the Data Controller during the preparation of the quote in order to perform services related to the professional translation activity. They will be known only as part of the full translation document during the preparation of your quotation and will be kept as a whole for the duration of the warranty and retention period, or in the absence of a contract until the 8th day after the termination of the offer.

Source of data: data provision of the Data Subject (customer).

Duration of data management: Data management lasts until the 8th day after the termination of the offer, or until the withdrawal of the data management consent. If the request for a quote is followed by an order, the data processing lasts as long as the claim related to the customer relationship can be enforced, i.e. for 5 years from the termination of the customer relationship (pursuant to § 6:58 of the Civil Code).

The period of processing of personal data in respect of the data on the invoice for the service after the termination of the contract is 8 years in accordance with the period of retention in § 169 of Act C of 2000 on Accounting.

Prior to the conclusion of the contract, data management is legally started at the time of the offer, based on the customer's request.

4.3.5. Data management related to legal obligation

a) Data management in relation to tax and accounting obligations:

As a freelance professional translator and interpreter under a legal obligation, in order to fulfill statutory obligations (primarily accounting, taxation) I manage personal data pre-defined in the law of my clients. The duration of the storage of personal data is 8 years after the termination of the legal relationship.

b) Documents of a permanent value specified in the Archives Act:

My company under a legal obligation manages documents of permanent value that have not been received by the customers according to the Act LXVI of 1995

on public records, public archives, and the protection of private archives (Archives Act).

Data storage time: until delivery to the National Archives of Hungary.

5. RECIPIENTS OF THE DATA, CATEGORIES OF RECIPIENTS (transmission of data)

Possible data transfers related to data management, to which the Data Controller is entitled on the basis of the Data Subject's consent, conclusion, and performance of a contract or under the provisions of law (the addressees are also other possible data controllers besides the Data Controller).

5.1. During data management, the Data Controller transmits the personal data of the Data Subjects to the following data processor:

In order to store personal data (contact by e-mail, storage of documents on a secure server), the company providing the hosting service and operation:

Hosting provider and website operator name (data processor): ALL-INKL.COM - Neue Medien Münnich

Registered office address: Hauptstraße 68, D-02742 Friedersdorf, Germany

EU Tax Number: DE 212657916

German tax number: 208/251/03091

Email address: info@all-inkl.com

Phone number: + 49-35872-353-10
Fax: + 49-35872-353-30

The data processor stores personal data and is not entitled to access personal data.

5.2. Issue of data transfer related to a language assistant:

The data controller does not transmit the personal data of the Data Subject to the native-speaker language assistant when preparing the professional translations. During the process of professional translations, my company may also use the services of a native-speaker language assistant (external subcontractor). Data Controller does not send the documents submitted for translation through its case management system, but **only the professional translation, which does not contain personal data** and to which the Client has given permission with his prior consent. Therefore, the language assistant does not qualify as a data processor. As a freelance professional translator and interpreter, I and the language assistant have entered into a cooperation agreement with each other that also covers confidentiality.

During the performance of the issued task, the external subcontractor is obliged and entitled to handle the documents through the case management system of the Data Controller. If the language assistant download or print any work material, the language assistant must ensure that the downloaded file and printed work material is illegibly erased, physically destroyed, and all third-party access is terminated when the task is completed. The full range of risks arising from any omission shall be borne by the language assistant.

If the Data Controller transmits any personal data of the Data Subject in connection with the performance of the translation, the Data Controller shall inform the Data Subject upon request about the data processor(s) used (their name, contact details, the scope of data transmitted to them and the duration of data management and data processing).

6. Measures related to information security

- 6.1. Paper-based documents are stored in a closed, secure location. All document movements are logged, only pre-authorized persons can access the documents in the locked document repository. Paper-based documents are also stored electronically for secure storage.
- 6.2. Electronically stored data and documents are only accessible to the sole proprietor as Data Controller and as an authorized person in order to perform her job duties (access authorization system).
- 6.3. Data Controller guarantees that documents containing personal data will not remain on her desk after work, and will store them locked to prevent unauthorized access.
- 6.4. Data Controller protects the room and rooms used by her as an office and archive, and thus the data managed, processed, and stored there by various protection systems (alarm, 6-point closing door).

The data controller stores the data on its own devices, with the exception of the data stored by the data processors. The devices are stored in a separate closed cabinet by the Data Controller. Data Controller protects y IT devices with a firewall and virus protection, backs up the data, and stores them in a different room and lockable place than the original data store in order to

protect them from destruction, data loss, file corruption, illegal damage due to IT device failure. Data Controller makes every effort to ensure that her IT tools and software continuously comply with the technological solutions generally accepted in the operation of the market.

Within the framework of electronic data security, we have introduced specific security measures in the IT systems operated by us (encryption, access protection, authorization management). However, please note that the confidentiality, integrity, and availability of data transmitted through our website are not the sole responsibility of My Business and therefore we cannot take full responsibility. We adhere to strict regulations regarding the data we receive in order to ensure the security of your (as concerned) data and to prevent unauthorized access.

6.5. Data Controller shall also destroy the paper-based data processed in accordance with the prescribed data protection requirements upon the expiry of the retention period.

6.6. Data Controller shall take all necessary technical and other measures to ensure the security of the data and to prevent any unauthorized use. She shall ensure the availability of data, an adequate level of protection, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, and accidental destruction and damage. Data Controller shall ensure the security of the data by appropriate technical and organizational measures.

7. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION / EUROPEAN ECONOMIC AREA OR TO AN INTERNATIONAL ORGANIZATION

No data will be transferred outside the European Union / European Economic Area or to an international organization.

8. DURATION OF DATA MANAGEMENT/PROCESSING

Data Controller shall process the Personal data for the period specified in point 4., for the period indicated therein.

After the expiry of the period specified above, the Data Controller shall delete the personal data within 8 days at the latest.

9. Data Subjects' rights

9.1. It is important for Data Controller that the Data Subject is aware of the rights he or she has under data protection. To this end, she grants the Data Subject the following rights concerning the processing of personal data entrusted to the Data Controller specified in this data management information:

- Right of access;
- Right to information;
- Right to rectification;
- Right of cancellation;
- The right to restrict data processing;
- Right to withdraw consent
- The right to data portability;

- Right to protest.

If you have any further questions regarding the data management of the Data Controller, please email translation@czintner.com.

9.2. Data Subjects' rights are detailed below:

9.2.1. Right of access and information:

At the request of the Data Subject, the Data Controller shall provide information on whether the management of his / her data is in progress. If so, Data Controller shall, in addition to providing access, inform the Data Subject about the categories of data processed, the purpose of the data management, the recipients or categories of recipients, the period of data storage, or the criteria for determining the period, exercising of the rights, reporting complaints to the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), the source of the data, and the possibility of automated decision-making. In the case of data transfers outside the European Union or the European Economic Area, the Data Subject shall also be informed of the appropriate guarantees provided in connection with the data transfer.

9.2.2. Right to rectification:

The Data Subject has the right to request the correction of his / her data from the Data Controller in case of their inaccuracy, or to request the supplementation of his / her incomplete data.

If it is necessary to correct the personal data managed by Data Controller, the Data Subject may request the correction of the data in writing (by post or e-mail) indicating the correct data.

The Data Subject is obliged to notify Data Controller in writing (by post or e-mail) of any change in any personal data managed by Data Controller immediately, but no later than within 8 days after the change. In the case of failure to provide or late delivery, the Data Subject is liable for the damage suffered by the data controller.

The Data Subject will be notified of the rectification of personal data.

9.2.3. Right of cancellation:

The Data Subject has the right to delete personal data concerning him or her without undue delay at his or her request, and the data controller is obliged to delete personal data concerning him or her without undue delay in the cases specified in Article 17 of GDPR:

- (a) personal data are no longer necessary for the purpose for which they were collected or otherwise processed;
- (b) the Data Subject withdraws his or her consent under Article 6(1) (a) or Article 9 (2) (a) and there is no other legal basis for the processing
- (c) the Data Subject objects to the processing pursuant to Article 21 (1) and there is no overriding legitimate reason for the processing or the Data Subject objects to the processing pursuant to Article 21 (2);
- (d) personal data have been processed unlawfully;
- (e) personal data must be deleted in order to fulfill a legal obligation to which the controller is subject under EU or Member State law;
- (f) personal data have been collected in connection with the provision of information society services referred to in Article 8 (1).

Based on the above, the Data Subject may request the deletion of his / her personal data if

- they are no longer needed by the Data Controller;

- the Data Subject withdraws his or her consent to the processing of certain data;
- the Data Subject objects to the processing of his or her personal data;
- if they have to be canceled in order to fulfill a legal obligation under the law;
- the Data Subject has concerns about the legal basis for the processing of his / her data by the Data Controller

If the Data Controller has disclosed personal data, i.e. transmitted them to a third party, Data Controller shall, in the exercise of its right to delete, take the reasonable steps to inform the data controllers to whom the personal data have been transferred, that the Data Subject had requested that the links to the personal data in question or a copy or duplicate of that personal data be deleted.

9.2.4. Right to restrict data management:

The Data Subject has the right to restrict the data management of the Data Controller if

- the Data Subject disputes the accuracy of the personal data;
- data processing is illegal;
- Data Controller no longer needs the personal data for the purpose of data management, but the Data Subject requests them in order to submit, enforce or protect legal claims;
- the Data Subject has objected to data processing.

No data management can be performed during the restriction period, the data can only be stored.

9.2.5. Right to withdraw consent:

If the Data Subject has consented to the use, processing, or sharing of his or her personal data, he or she may withdraw his or her consent at any time, unless the data are necessary for the provision or performance of the service. The Data Subject acknowledges that in the latter case the conduct of his / her case may be impossible, or the performance of the requested service may not be possible depending on the data.

9.2.6. Right to data portability:

The Data Subject shall have the right to receive the personal data made available to Data Controller in a structured, widely used machine-readable format and to transfer such data to another data controller without being hindered by Data Controller whose provided personal data if:

- data management is based on consent; and
- data management is automated.

In exercising the right to data portability, the Data Subject shall have the right, if technically feasible, to request the direct transfer of personal data between data controllers.

9.2.7. Right to protest:

In connection with the exercise of the rights listed above, the Data Subject is entitled to contact Data Controller: Dr. Dóra Czintner. (headquarters: Hungary 2013 Pomáz, Illyés Gyula u. 57.) and via the e-mail address translation@czintner.com. The Data Subject may object to the management of his data.

Data Controller shall, without undue delay from the submission of the request, but no later than within 25 days, provide information in writing, in a comprehensible form, regarding the contents of the request and the measures taken as a result of the request.

I may refuse to comply with a Data Subject's request if I prove that the processing is justified by compelling legitimate reasons which take precedence over the Data Subject's interests, rights, and freedoms or which relate to the submission, enforcement, or defense of legal claims.

This may be the case if the provision of personal data is based on a law or a contractual obligation, or a precondition for concluding a contract is that the Data Subject is obliged to provide the personal data indicated above, failure to do so may result in the following legal consequences:

- request for data in order to fulfill a legal obligation: making it impossible to fulfill the legal obligation,
- request for data for the purpose of concluding a contract: failure to conclude the contract,
- request for data in order to use the service: refusal to provide the service, loss of warranty rights after the performance

10. RIGHT OF APPEAL TO THE DATA PROTECTION SUPERVISORY AUTHORITY, THE COURT OF JUSTICE

- 10.1. Data Subjects can have a legal remedy or complaint in connection with data management at the Hungarian National Authority for Data Protection and Freedom of Information(NAIH), the contact details of which are as follows:

- address: 1374 Budapest, Pf.: 603.
- registered office address: 1055 Budapest Falk Miksa utca 9-11.
- phone: +36 (1) 391-1400
- fax: +36 (1) 391-1410
- e-mail: ugyfelszolgalat@naih.hu
- webpage: <http://www.naih.hu>

- 10.2. I would also like to inform you that in addition to the above and without prejudice to your rights described therein, you have the right to take legal action against your data in breach of the General Data Protection Regulation (GDPR) and if the GDPR suffered pecuniary and non-pecuniary damage, to enforce a claim for damages against the Data Controller.

Data Controller is obliged to prove that the data management complies with the provisions of the law. The transferee must prove the lawfulness of the data transfer. Litigation in connection with data management is a matter for the courts.

I kindly ask You, before appealing to a supervisory authority or court, to contact me (address:1036 Budapest, Árpád Fejedelem útja 69. 1 em. 4 a., or e-mail: translation@czintner.com) in order to consult and investigate, resolve the problem as quickly as possible.

11. Personal data breach/ Data protection incident

A data protection incident is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal information that is transmitted, stored, or otherwise handled.

Data Controller shall keep a register for the purpose of monitoring the measures related to the data protection incident, informing the supervisory authority and informing the user, containing the scope of personal data, number and date of the incident, date, circumstances, effects and measures taken.

In the event of an incident, the controller shall inform the user and the supervisory authority within a maximum of 72 hours of the occurrence of the data protection incident, provided that it did not pose a risk to the rights and freedoms of natural persons.

Possible risks include:

- loss or theft of devices containing data (e.g. laptop, external hard drive)
- burglary
- server attack
- intentional or negligent release or making available of personal data to an unauthorized third party.

Data Controller pays special attention to data security. Under Article 32 of GDPR, it will do its utmost to raise data protection and data security awareness. If you notice a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to, personal data transmitted, stored, or otherwise handled, please notify me (translation@czintner.com) immediately.

12. OTHER PROVISIONS:

Data Controller reserves the right to unilaterally amend this data management information in addition to the obligation to notify the Data Subjects. The changes will take effect on the date specified in the notice unless the Data Subject objects to the changes. By using the website, the customer accepts the contents of the amended Data Management Information.

Data Controller does not check the personal data provided to her. The person who provided the data is solely responsible for the correctness and adequacy of the provided data. When entering an e-mail address of any user, he/she is also responsible for ensuring that only he/she uses the service from the e-mail address provided.

Date of entry into force: 02. October, 2020.

Pomáz, 1st October, 2020.

Dóra Czintner, M.D.

freelance medical translator and interpreter, medical doctor