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# **Privacy Policy**

Regarding the processing of data concerning an individual as an employee in connection with the establishment, maintenance and termination of the employment relationship with the Hungarian Ice Hockey Federation as the employer

# 1. Name of the Data Controller

Name: Hungarian Ice Hockey federation (hereinafter: Controller, Employer, HIHF)
Seat and postal address: 1146 Budapest, Istvánmezei út 1-3.
Telephone: +36 1 460 6863
Fax: +36 1 460 6864
E-mail: info@icehockey.hu

# 2. Name and contact details of the Data Protection Officer

Data Protection Officer of the HIHF: Lehoczki-Gulyás Vivien Contact: <u>adatvedelem@icehockey.hu</u>

# 3. Specification of data processing

The HIHF processes personal data relating to natural persons who are employed by it as employees (hereinafter referred to as data subjects or employees). This Privacy Policy describes the processing of data in the event of the establishment, maintenance and termination of an employment relationship.

# 4. Legal basis, purpose of data processing, data retention period, recipients

The processing of data by HIHF is based on Article 6 (1) b) of Regulation (EU) 2016/679 of the European Parliament and Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: GDPR), given that the processing is necessary for the purpose of concluding and performing an employment contract. In the case of certain legal obligations imposed on HIHF as an employer, the legal basis for the processing is Article 6(1)(c) GDPR and Article 9(2)(h) and (b) GDPR. The processing based on Article 6(1)(f) of the GDPR - legitimate interest of the employer - and Articles 6(1)(a) and 9(2)(a) of the GDPR - consent of the employee - are indicated in the relevant section of the information notice.



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# 4.1 Scope of personal data processed in connection with employment documents relating to the conclusion of a contractual relationship:

**Purpose of data processing:** conducting human resources and labour administration based on the legal obligations related to the establishment, maintenance and termination of employment relationships.

- Name, place and date of birth, mother's name, permanent address, nationality
- tax identification number, personal identity card number, tax number, social security number, bank account number,
- highest level of education, qualifications,
- child(ren)'s details (name, date of birth, social security number, possible disability),
- phone number, e-mail address,
- job title, salary, pension reference number
- information on former employment.

Data processing is carried out on the basis of Section 10 of Act I of 2012 on the Labour Code (hereinafter referred to as "Labour Code" / Mt.).

**Duration of data management:** 3 years after termination of employment. **Recipients:** RSM Hungary Zrt., National Tax and Customs Office (hereinafter: NAV)

### 4.2 Data processed in the context of the employment:

**Purpose of data processing:** managing human resources and labour affairs based on the legal obligations relating to the creation, amendment, termination and registration of employment contracts.

- Name, place and date of birth, mother's name, permanent address,
- tax identification number, social security number, bank account number
- salary, job title, signature.

Data processing is carried out on the basis of Section 10 of Act I of 2012 on the Labour Code (hereinafter referred to as "Labour Code" / Mt.).

**Duration of data management:** five years after the insured person reaches the retirement age, on the basis of Act LXXXI of 1997 on Social Security Pension Benefits. **Recipients:** Woss Kft., RSM Hungary Zrt., NAV

### 4.3 Data processed for occupational fitness assessment:



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**Purpose of data processing:** administration of the statutory occupational fitness assessment (referral for occupational medical examination, registration of medical fitness opinions) to determine whether the person concerned is medically fit to perform the job and whether the job he or she is seeking to perform presents a risk of ill-health.

- Name, place of birth, date of birth, mother's name,
- social security number, job title,
- the fact whether the employee is fit and able to work.

Data processing is based on the NM Decree 33/1998 (VI. 24.).

**Duration of data management:** until termination of the employment. **Recipients:** Dr. Csaba Cseke László MD, Woss Kft.

### 4.4 Data processed in connection with the declaration of personal, family benefits:

**Purpose of data processing:** managing the administration (determination, documentation and transmission of benefits) for the purpose of claiming the benefits provided by law for the employee.

In case of a personal benefit:

• Name, fact and date of disability, if applicable, whether it is permanent.

Data processing is carried out on the basis of Act CXVII of 1995 on personal income tax.

Declaration of waiving the benefit for persons under 25 years of age:

• Name, tax identification number, signature.

Data processing is carried out on the basis of Act CXVII of 1995 on personal income tax.

Benefits for first-time married couples:

- Name, tax identification number, spouse's name and tax identification number, date of marriage, start of claim, signature,
- name of spouse's employer.

Data processing is carried out on the basis of Act CXVII of 1995 on personal income tax.

Benefit for mothers under 30:

- Name, tax identification number, signature,
- name and tax identification number of the child with regard to eligibility.



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Data processing is carried out on the basis of Act CXVII of 1995 on personal income tax.

For family benefits:

- Name, tax identification number, signature,
- name and tax identification number of dependents;
- name and tax identification number of the spouse of the individual claiming the family benefit,
- the fact of eligibility (e.g., pregnancy).

Data processing is carried out on the basis of Act LXXXIV of 1998 on Family Support.

**Duration of data management**: five years after the insured person reaches retirement age, on the basis of Act LXXXI of 1997 on Social Security Pension Benefits. **Recipients:** RSM Hungary Zrt., NAV

### 4.5 Data processed in connection with the granting additional leave due to child(ren):

**Purpose of data processing:** managing the administration (establishment, recording and transmission of benefits) for the purposes of claiming the benefits provided by law for the employee.

- Child's name, date and place of birth, mother's maiden name,
- eligibility for the family allowance supplement.

The processing of data is carried out on the basis of Section 118 of the Labour Code.

**Duration of data management:** 3 years from the date of the establishment of entitlement and the creation of the related document. **Recipients:** RSM Hungary Kft., NAV

#### 4.6 Data processed in connection with the reimbursement of travel expenses:

**Purpose of data processing:** administering the reimbursement of expenses to be paid to the employee.

• Name, residence, registered address, signature.

Data processing is carried out on the basis of Government Decree No 39/2010.

**Duration of data management:** 3 years from the document's issue. **Recipients:** Woss Kft., RSM Hungary Kft.



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### 4.7 Data processed in the context of the working time register:

**Purpose of data processing:** keeping records of data (hours worked, overtime, absences) necessary to perform payroll in accordance with the relevant legislation.

• Name, tax identification number, starting date of employment.

Data processing is carried out on the basis of Section 10 of Act I of 2012 on the Labour Code.

**Duration of data management:** five years after the insured person reaches the retirement age, on the basis of Act LXXXI of 1997 on Social Security Pension Benefits. **Recipients:** RSM Hungary Zrt., Woss Kft.

### 4.8 Data processed in connection with vehicle use:

**Purpose of data processing:** administering the administration of the use of vehicles to be provided to employees, both in relation to privately owned and HIHF-owned vehicles, including vehicle use agreements, time sheets, expense claims and driver registration.

In case of using a privately owned vehicle for work purposes:

- Name, place and date of birth, mother's name,
- address, tax identification number, vehicle registration number, signature,
- in case of non-owned vehicle, name, mother's name, place of birth and signature of the owner of that vehicle at the time of authorisation,
- documentation proving ownership of the vehicle.

In case of use of a vehicle owned by the HIHF:

- Name, department,
- vehicle registration number, specifications,
- signature of employee.

Data processed in relation to waybill management:

- Registration number, name of driver, name of further passengers, signature,
- route, date of vehicle use,
- departure-arrival time and odometer reading.

The data processing is based on Act CXVII of 1995 on personal income tax.

**Duration of data management:** 8 years after termination of employment, based on Act C of 2000 on Accounting.

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Data management related to fuel card statements:

• Card number, refuel value, location, date and time.

The processing is based on the performance of the contract. **Duration of data management:** 1 year after termination of vehicle use.

### 4.9 Data processed when entering and using the car park of the Hungarian Sports Hall:

Purpose of data processing: free parking for employees at the designated place of work.

- Name, name of employer,
- model and registration number of the vehicle.

The processing is based on the legitimate interest of the employer. **Duration of data management:** upon request for entry, but at the latest until the termination of

employment.

Recipients: Valton-Sec Zrt.

# 4.10 Data processed during the planning and organisation of training, workshops, further training, courses:

**Purpose of data processing:** maintaining and developing the professional skills of employees, supporting and ensuring the acquisition of any missing competences by the employer in order to ensure effective cooperation between departments.

- Name, position, e-mail address,
- answers and solutions to any examinations or tasks that indicate professional competence.

Data processing is based on contractual compliance.

Duration of data management: Until termination of employment.

**Recipients:** any contracted organisation entrusted by the employer with the provision of education, training or education.

# 4.11 Data processed in connection with the delivery/receipt and registration of work equipment and access to IT and information systems, and the registration thereof:

**Purpose of data processing:** providing employees with the IT and information tools, services and access to workplace software applications necessary for their work.

• Name, position,



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• e-mail address, phone number.

For telephone and internet services provided to a relative of the employee:

- Name, internet subscription package,
- address, phone number.

Data processing is based on contractual compliance.

**Duration of data management:** Until the date of leaving the fleet, but at the latest until the employee is no longer employed by HIHF. **Recipients:** Woss Kft., Vodafone Zrt.

### 4.12 Data processed in connection with the use and registration of company credit cards:

**Purpose of data processing:** records of users of debit cards issued to employees to cover expenses incurred in the interests of HIHF and in connection with work.

- Name, position,
- e-mail address, phone number.

Data processing is based on the legitimate interest of the employer.

**Duration of data management:** 3 years after termination of employment. **Recipients:** Woss Kft.

### 4.13 Data processing in connection with company events for employees:

**Purpose of data processing:** events organised for employees (annual team-building, Christmas dinner) to strengthen workplace cohesion as well as its documentation.

- Name, e-mail address,
- dietary information (intolerance, allergy, preference),
- clothing size, likeness.

Data processing is based on the consent of the employee.

**Duration of data management:** Until 30 days after the event. Publication of images in the event's community group until consent is withdrawn.

**Recipients:** Microsoft 365, Facebook, the venue and outside service provider responsible for organising the event.

### 4.14 Recipients identified in the Policy:



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- National Tax and Customs Administration
- Hungarian National Treasury
- RSM Hungary Zrt., payroll data processor, 1139 Budapest, Lomb u. 30-32. Tax no.: 14020867-2-41
- Hazai Adó Kft., accounting data processor, 1203 Budapest, Téglagyártó út 16. Tax no.: 23897397-1-43
- Woss Kereskedelmi Kft., data processor operating the messaging system and server, 1141 Budapest, Fogarasi út 98. Tax no.:12021927-2-42
- Vodafone Magyarország Zrt., mobile phone and internet service provider, 1112 Budapest, Boldizsár utca 2. Tax no.: 11895927-2-44
  - Dr. Cseke Csaba László MD, occupational health specialist, 1125 Budapest, Kútvölgyi út 51. Tax no.: 72529593-1-43
- Valton-Sec Zrt., service provider responsible for guarding the HSH car park, 1024 Budapest, Hegyalja út 109. Tax no.: 27312050-2-44

#### 5. Data subjects' rights in relation to data processing

#### Right to information and access

The data subject has the right to obtain from the HIHF, using the contact details provided in points 1 and 2. to be informed whether or not his or her personal data are being processed and, if so, to be informed that the HIHF:

- which personal data,
- on what legal basis,
- for what purpose,
- the duration of the processing; furthermore
- to whom, when, under what legal basis, to which personal data HIHF has given access or to whom HIHF has transferred the personal data;



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- source of personal data;
- as well as whether the HIHF uses automated decision-making and its logic, including profiling.

The HIHF shall provide the data subject with a copy of the personal data processed free of charge on request for the first time, after which it may charge a reasonable fee based on administrative costs.

In order to ensure data security and to protect the rights of the data subject, the HIHF is obliged to verify the identity of the data subject and of the person who wishes to exercise his/her right of access, and to this end, the provision of information, access to or copying of the data is also subject to the identification of the data subject.

### Right to rectification

The data subject may request, using the contact details provided in points 1 and 2, that the HIHF to amend any of his/her personal data. If the data subject can credibly demonstrate the accuracy of the data to be corrected.

### Right to restriction of processing

The data subject may request, using the contact details provided in points 1 and 2, that the the HIHF to restrict the processing of his/her personal data (the restriction of processing and ensuring that the processing is kept separate from other data) provided that:

- disputes the accuracy of personal data (in which case the HIHF will limit the processing for the time it takes to verify the veracity of personal data))
- he data processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use,
- the processor no longer needs the personal data for processing, but the data subject requests them for the establishment or exercise of legal claims or protection
- he data subject has objected to the processing (in this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller override those of the data subject).

### Right to object

The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of legitimate interest. In such a case, the HIHF may no longer process the personal data, unless the HIHF demonstrates compelling legitimate interests overriding the interests, rights and freedoms of the data subject, or relating to the establishment, exercise or defence of legal claims.



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### Right to erasure

The data subject may request the erasure of his or her personal data if:

- the HIHF no longer needs it for the purposes for which it was collected or otherwise managed,
- the data subject withdraws consent and there is no other legal basis for processing,
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing,
- if personal data have been unlawfully processed,
- if personal data must be erased in order to comply with a legal obligation concerning HIHF,
- if personal data have been collected in connection with providing information society services.

### Right to legal remedy

If you have any questions or complaints about this privacy policy, please contact HIHF via one of the following contacts:

E-mail: adatvedelem@icehockey.hu , Seat and postal address: 1146 Budapest, Istvánmezei út 1-3. Telephone: +36 1 460 6863

In all cases, we will review your complaint and do our best to deal with it appropriately. The HIHF will comply with the data subject's request to exercise their rights within thirty days of the request. Depending on the number and complexity of the requests received, this time limit may be extended by a further two months, and the HIHF will inform the data subject of the reasons within one month.

If, despite your complaint, you still object to the way HIHF processes your personal data or do not wish to lodge a complaint with HIHF, you have the following legal remedies.

### Contact details of the Supervisory Authority:

National Authority for Data Protection and Freedom of Information (NAIH)

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Po. box.: 9.

Telephone: 06 1/391-1400 Telefax: 06 1/391-1410

This Privacy Policy is valid from: November 3, 2023