

Data Protection Policy of Semmelweis Kft.

The Privacy Policy regarding the data provided through the registration and used related to the 53rd World Medical Tennis Society Congress and Championship

I. The Data Controller

Semmelweis Egészségügyi Szolgáltató és Tanácsadó Kft. (Semmelweis Medical Services)
(hereinafter: Semmelweis Kft. or Data Controller)

Address: 1085 Budapest, Üllői út 26.

E-mail: info@semmelweispremium.hu

Phone: +36 (1)

Website: www.semmelweispremium.hu

II. Explanatory Provisions

Data Subject: A natural person identified or identifiable from any information. For the purposes of this Privacy Policy, the term "Data Subject" shall be understood to include, mutatis mutandis, persons who register for the event, persons registered, persons accompanying a registered person and persons submitting a protest.

Personal data: Any information or data that can be associated with the Data Subject, in particular, the name, the date and place of birth, mother's name, and one or more factors specific to their physical, physiological, mental, economic, cultural, or social identity, and any inference that can be drawn from the data concerning the Data Subject.

Data set: The set of data managed in one record.

Data Management: Regardless of the procedure used, any operation or set of operations which is performed upon the data, in particular, any collection, registration, record, organization, storage, alteration, use, retrieval, transfer, publishing, alignment or combination, blocking, erasure or destruction of the data, prevention of their further use, the creation of photographs, sound recordings or videos, and the record of physical characteristics which can be used to identify a person (e.g. fingerprints, palm prints, DNA samples or iris scans).

Data Processing: The totality of processing operations carried out by a Data Processor acting on behalf of or under the instructions of the Data Controller.

Data transfer: Making Personal Data available to a specified third party.

Data Processor: A natural or legal person or an unincorporated association that processes personal data on behalf of or under the authority of the Data Controller, within the limits

and under the conditions laid down by legislation or by a legally binding act of the European Union.

Public disclosure: Making Personal Data available to any member of the public.

World Medical Tennis Society Congress and Championship registration system: The registration system allowing entry into the World Medical Tennis Society Congress and Championship, a central electronic (digital) registration system, operated by Semmelweis Kft., which is available at www.semmelweispremium.hu.

Person making the registration: A person with an independent registration is entitled to act on behalf of a participant (hereinafter referred to as the "person making the registration"). The personal data required for the registration are entered into the registration system by the person making the registration, based on consent to data management.

For the interpretation of terms not defined in this Data Protection Policy, the World Medical Tennis Society rules of play shall apply.

III. Content of the Data Protection Policy – the purpose and legal basis for processing data

1. Content of the Data Protection Policy, persons covered

1.1. The present data protection policy sets out the rules governing the processing of a Data Subject's personal data through and in connection with the registration system of the World Medical Tennis Society Congress and Championship, furthermore, in connection with participation in the World Medical Tennis Society Congress and Championship tournaments.

1.2. Data Subjects consent to the processing of their data by the Data Controller under this Data Protection Policy by providing a declaration made at the time of registration for the World Medical Tennis Society Congress and Championship and by participating in the World Medical Tennis Society Congress and Championship.

1.3. The present Data Protection Policy applies to all Data Subjects, as well as to all employees and agents of the Data Controller and third parties involved in the operation of the World Medical Tennis Society Congress and Championship registration system.

2. Legal basis of data processing

Act V of 2013 on the Civil Code (hereinafter: Civil Code) is available under the following links in Hungarian and English: http://njt.hu/cgi_bin/njt_doc.cgi?docid=159096.339348 and <https://njt.hu/jogszabaly/en/2013-5-00-00>

Act CXII on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Infotv.) is available under the following links in Hungarian and English: http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A1100112.TV and https://www.naih.hu/files/Privacy_Act-CXII-of-2011_EN_201310.pdf

The General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 hereinafter: GDPR) is available under the following links in Hungarian and English:

<https://eurolex.europa.eu/legal-content/HU/TXT/?uri=CELEX%3A32016R0679> and <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>

The Data Controller processes the personal data of Data Subjects in accordance with the Civil Code, the Infotv, and the GDPR.

3. General purposes of data processing

a) To publish and make available information and results of the World Medical Tennis Society Congress and Championship to those who registered and accompanying persons through the registration system, and to ensure that their participation in the World Medical Tennis Society Congress and Championship is regular and transparent.

b) To provide the tournament organizers and promoters with registration data to carry out their duties concerning the World Medical Tennis Society Congress and Championship and related events.

c) To make the photos, videos and audio recordings taken at the World Medical Tennis Society Congress and Championship available to the public and to allow the free use of the recordings for the purposes of providing information about the tournament to the promoters and sponsors of the tournament and of reporting to the sponsoring organizations; furthermore, to allow the free use of the recordings by the promoters and sponsors for their communication and promotional activities related to the event.

4. Legal basis and ways of data processing

4.1. By registering for and by participating in the World Medical Tennis Society Congress and Championship, the Data Subject declares that he/she has read the present Data Protection Policy in full and accepts the provisions contained herein as binding upon him/her, and voluntarily, informedly and expressly consents to the Data Controller processing his/her personal data as defined in the Data Protection Policy for the purposes of the processing specified therein, in accordance with the provisions of the Info Law and the present Data Protection Policy.

4.2. Among the Data Subjects, those registering expressly consent, in a separate written declaration, the Registration and Data Processing Declaration, to the recording of their personal data specified in this Data Protection Policy by the person who makes the registration on behalf of their employer, and to the processing of such data by the Data Controller in the registration system, in accordance with the provisions of the Infotv, the GDPR and this Data Protection Policy.

4.3. On behalf of a legally incapacitated minor, the legal guardian shall act and make the necessary declarations. A minor who has not reached the age of 14 is legally incapacitated.

4.4. If the Data Subject making the declaration is under 18 years of age, the consent or subsequent approval of his/her legal guardian is required for the declaration to be valid.

4.5. The person making the registration is only entitled to record the Data Subject's personal data in the World Medical Tennis Society Congress and Championship registration system based on the Data Subject's Data Processing Declaration. The person making the registration must act in good faith when recording the data and when completing the registration and shall only record true and accurate data in the registration system.

4.6. The consent of Data Subjects to processing their personal data shall be given voluntarily in all cases and after they were duly informed. This voluntary, informed, and explicit consent is the primary legal basis for the Data Controller's data processing as defined in the present Data Protection Policy.

4.7. In cases where data processing is not based on the Data Subject's consent, the legal basis for data processing shall be explicitly stated separately where the type of data processing is mentioned.

4.8. The Data Controller shall process the Data Subjects' personal data only for the purposes, in the manner, and for the duration specified in this Data Protection Policy and will ensure that at all stages the data processing is carried out in accordance with the purposes specified therein.

4.9. The persons who have access to the data under the provisions of this Data Protection Policy, in particular the organizers and managers of the competitions, as well as the persons who make the registrations, shall process the data that come to their knowledge only in accordance with the purposes of this Policy, following its provisions and complying with its purposes. For that, they are individually legally liable.

5. Modification of the Data Protection Policy

The Data Controller reserves the right to unilaterally modify the current Data Protection Policy alongside the information provided to the Data Subjects at the website of Semmelweis University. The Data Controller shall publish the modified Data Protection Policy on its website five (5) days before the Data Protection Policy entries into force.

IV. Types of data processing – scope and source of personal data, purpose and legal basis of data processing, duration of data processing

1. Data processing related to registration

1.1 Scope of personal data and purpose of data processing

The purpose of processing the data necessary for the registration of the Data Subject is to identify the participants and their companions in order to enable their participation in the organized competitions, to ensure the proper conduct of the competitions, and to allow for the long-term traceability of the results achieved during the competitions.

The following information is required for registration. Providing these data is mandatory.

Personal data	Purpose of data processing
First name and Last name	Required for identification
Passport number	Required for identification
Designation of the practiced medical profession	Required for identification

The provision of the name, passport number, and the practiced medical profession combined are indispensable for linking the entries made by the Data Subject in the competition system, for connecting the Data Subject with the institution represented by them, and for making their achievements known.

The provision of the following information is voluntary and is dependent on the decision of the Data Subject.

Personal data	Purpose of data processing
Telephone number	Enables direct contact and communication of notifications

E-mail address	Enables direct contact and communication of notifications
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In addition to the above, the following information is recorded in connection with each participant.

Data	Purpose of data processing
Employer of the Data Subject including address	Recording of results
Results of Data Subject	Determination of competition results
Information regarding any disqualification	Determination of competition results

1.2 Legal basis of data processing

The legal basis of data processing is the prior, informed, voluntary and explicit consent of the Data Subject.

1.3 Source of data

The source of the data is primarily the Data Subject. The Data Subject voluntarily provides the data to the Data Controller through the person submitting the registration.

1.4 The duration of data processing

Semmelweis Ltd. processes the personal data of the participants for a period of 1 year to ensure the traceability of their participation, their individual and team results, and to guarantee the transparency of the competition system operation.

Within the specified duration, Semmelweis Ltd. processes the data until any withdrawal of consent by the Data Subject. The Data Subject can withdraw their consent at any time by sending a written letter to one of the contact details specified in Section I.

2. Data processing related to Participation in the World Medical Tennis Championship: audio and visual recording

2.1 Scope of data and purpose of data processing

During participation in the World Medical Tennis Championship, images and sound recordings may be taken of the Data Subjects. The purpose of these recordings is to make them accessible to the participants, enquirers, and promoters. Additionally, the recordings are intended for unrestricted use by the promoters of the event (especially its sponsors) to inform about the competition and report to supporting organizations. For sponsors, this ensures the free use of the recordings for their communication and promotional activities related to the event.

2.2 Legal basis of data processing

Primarily, the legal basis for data processing is the prior consent of the Data Subject. Secondly (in the case of mass recordings), the Civil Code Act V of 2013, Section 2:48(2) applies, stating: "The consent of the person concerned shall not be required for recording his image or voice and for the use of such a recording if the recording was made of a crowd or of an appearance in public life."

2.3 Source of data

The source of the data is primarily the Data Subject. The Data Subject voluntarily provides the data to the Data Controller.

2.4 The duration of data processing

Semmelweis Ltd. processes personal data until a withdrawal of consent by the Data Subject but for a maximum duration of 1 year. The Data Subject can withdraw their consent at any time by sending a written letter to one of the contact details specified in Section I.

3. Data processing related to Participation in the World Medical Tennis Championship: legal remedy

3.1 Scope of data and purpose of data processing

The purpose of processing data related to protests is to conduct the procedure for the review of the protest submitted following the provisions of the Competition Regulations in case of detected irregularities during the competition and to notify those involved in the decision.

The following information is required for a protest. Providing this information is mandatory.

Personal data	Purpose of data processing
Name of the person submitting the protest	Required for identification
E-mail address of the person submitting the protest	Required for maintaining contact
Bank account number of the person submitting the protest	Required for a refund of the amount in the case of a favorable decision
Name of the participant and/or team involved in the protest and relevant event	Required for the identification of parties involved in the protest

3.2 Legal basis of data processing

The legal basis for data processing is the prior consent of the Data Subject.

3.3 Source of data

The source of the data is primarily the Data Subject. The Data Subject voluntarily provides the data to the Data Controller.

3.4 The duration of data processing

The Data Controller processes personal data related to legal remedies until the conclusion of the procedure. Within the specified period, Semmelweis Ltd. processes personal data until any withdrawal of consent by the Data Subject. The Data Subject can withdraw their consent at any time by sending a written letter to one of the contact details specified in Section I.

4. Processing personal data of the person who makes the registration

4.1 Scope of data and purpose of data processing

The purpose of data processing is to facilitate the registration and access of the person making the registration in the registration system. The provision of the following information is mandatory for registration in the registration system.

Personal data	Purpose of data processing
Name of the person making the registration	Required for identification
E-mail address of the person making the registration	Required for registration and communication
The username of the person making the registration	Required for registration

4.2 Legal basis of data processing

The legal basis for data processing is the prior consent of the Data Subject.

4.3 Source of data

The source of the data is primarily the Data Subject. The Data Subject voluntarily provides the data to the Data Controller.

4.4 The duration of data processing

The Data Controller processes personal data until a withdrawal of voluntary consent by the Data Subject. The Data Subject can withdraw their consent at any time by sending a written letter to one of the contact details specified in Section I.

V. Access to data and data security measures

1. Access to data and transmission of data

1.1 Access to data and transmission of data

1.1.1 Any personal data provided by the Data Subject may be accessed – in compliance with the data processing and data security rules set forth in this Data Processing Policy –by employees of Semmelweis Ltd., as well as by competition organizers and coordinators specified in the Regulations of the World Medical Tennis Championship, to perform their tasks related to the organization and execution of the competition.

Furthermore, for the purpose of ensuring the continuous and proper functioning of the World Medical Tennis Championship registration system, Semmelweis Ltd. may engage other data processors.

Specification of the additional data processors engaged:

Name of the Company	Address	Activity
Jacsómédia	1135, Budapest, Szent László út 34.-38.	Creation and operation of the registration interface
Hungarian Medical Tennis Association		Providing organization of competitions, supervisor and umpire activity, as well as result administration

1.2 Transmission of data

1.2.1. The Personal Data of the Data Subject may only be disclosed to third parties in cases and to the extent specified in this Data Processing Policy, as well as to fulfill the legal obligations of the Data Controller, based on official requests by the authorities. Additionally, different data processing activities may be linked only in cases described above, provided that the conditions for processing are met for each concerned individual's personal data. Before complying with official data requests, the Data Controller examines, for each piece of data, whether there is indeed a legal basis and obligation for data transmission.

1.2.2. Personal Data of the Data Subject shall be transmitted to third parties for the purposes defined below based on the explicit and unambiguous consent of the Data Subject:

a) to the Hungarian Medical Tennis Association, who are involved in the organization of the competition and in administering and communicating the results.

1.2.3. For the purpose of verifying the legality of data transmission and informing the Data Subject, the Data Controller maintains a record of data transmissions. This record includes the date, the legal basis and the recipient of the data transmission, the description of the scope of the transmitted personal data, as well as other information specified in the legislation prescribing data processing.

2. Data Security Measures

2.1. The computer systems and other data storage locations of the Data Controller are located at its headquarters and its data processors.

2.2. The data controller shall select and operate the information technology tools that process personal data in a way that these data are:

a) accessible to those authorized to access them (availability);

b) its authenticity and authentication are ensured (authenticity of processing);

c) their integrity can be verified (data integrity);

d) protected against unauthorized access (data confidentiality).

2.3. In particular, the Data Controller shall take appropriate measures to protect the data against unauthorized access, modifications, transmission, disclosure, deletion or destruction, as well as against unintentional destruction, damage or loss of access due to changes in the technology applied.

2.4. The Data Controller shall ensure the security of data processing by employing technical, administrative and organizational measures that provide a level of protection appropriate to the risks associated with the processing, taking into account the current state of technology.

2.5. The Data Controller shall retain the following during data processing:

a) confidentiality: it protects the information so that only those entitled have access to it;

b) integrity: it protects the accuracy and completeness of the information and the method of processing;

c) availability: it ensures that, when authorized users may need it, they have effective access to the information required and the means to obtain it.

2.6. The IT systems and networks of the Data Controller and its partners are protected against computer viruses and cyber-attacks. The operator ensures security through protection procedures on the server level and application level.

VI. Rights of those concerned regarding data processing

Data Subjects may request information about data processing and may request the rectification, blocking or, in the case of inaccurate data, erasure of their personal data. Data Subjects may exercise their rights concerning the processing of personal data by sending a request to the contact e-mail address provided in point I.1 of the Privacy Policy.

1. The right to request information

1.1. Data Subjects may request information in writing from the Controller about which personal data the Controller processes, on what legal basis, for what purposes and for how long; furthermore, to whom, when, based on what legal provision or other authorization, to which personal data, or to whom the Controller has granted access, or to whom the Controller has transferred his or her data.

1.2. The Data Controller shall respond to the Data Subject's request by sending an e-mail to the contact details provided by the Data Subject within a maximum of 30 days of receipt of the request. This information shall be provided free of charge if the Data Subject did not submit a request for information with the same content to the Data Controller in the year concerned. In other cases, the Data Controller may make the provision of the information subject to the payment of a fee.

2. The right to rectification

2.1. The Data Subject may request in writing that the Data Controller amend or rectify any of their data. The Data Controller shall comply with the Data Subject's request within a maximum of 30 days of receipt of the request and shall notify the Data Subject thereof by e-mail to the contact details provided by the Data Subject.

3. The right to erasure

3.1. Personal data shall be deleted if

- a) the processing is unlawful;
- b) the Data Subject requests it, in accordance with Article 17 of the GDPR;
- c) the data are incomplete or inaccurate and cannot be lawfully rectified, provided that erasure is not prohibited by law;
- d) the purpose of the processing has ceased or the time limit for the storage of the data laid down by law has expired;
- e) it has been ordered by a court or the Authority.

3.2. Data Subjects may request in writing the erasure of their personal data by the Data Controller. The Controller shall refuse the erasure request if the Controller is required by law to retain the data.

3.3. If a concerned storage medium contains personal data of data subjects other than the Data Subject requesting erasure, and these data are inseparable and indelible (e.g. images or minutes), the deletion of the data does not necessarily mean the complete inaccessibility of the storage medium, but it can only be used with the data of the Data Subject requesting erasure being made inaccessible.

The Data Controller shall comply with the Data Subject's request within a maximum of 30 days of receipt and shall notify the Data Subject thereof by sending a letter to the contact details provided by the Data Subject. The erasure is free of charge. The Data Controller may only decide not to notify the Data Subject about the rectification or erasure if that would not be contrary to the legitimate interests of the Data Subject.

4. The right to blocking

4.1 Instead of erasure, the Data Controller shall block personal data if the Data Subject requests so in writing, or if, based on the information available to them, it is likely that erasure would harm their legitimate interests. Data thus blocked shall be processed by the Controller only for as long as the processing purpose or other circumstances which precluded the deletion of the personal data persist.

4.2 Data Subjects may request the blocking of their data if it is necessary for the purposes of official or judicial proceedings initiated by the Data Subject that their personal data do not become deleted. In this case, the Data Controller shall continue to store the personal data until requested by the authority or court, after which the data shall be deleted.

5. The right to objection

5.1. Data subjects may object in writing to the processing of their personal data using the contact details provided in Section 1.1,

a) if the processing or transfer of the data is necessary for the fulfilment of a legal obligation to which the Controller is subject or for the legitimate interests of the Controller, the data importer or a third party, except in cases of mandatory processing;

b) where the personal data are used or transmitted for direct marketing, public opinion polling or scientific research purposes; and

c) in other cases, specified by law.

5.2. The Data Controller shall examine the objection within a maximum of fifteen (15) days from the date of submission of the objection, with the simultaneous suspension of the processing, and shall inform the applicant in writing about the outcome. If the objection is justified, the Controller shall terminate the processing and block the data. The Data Controller shall notify the objection and the action taken on the basis thereof to all persons/entities to whom the personal data affected by the objection were previously disclosed, which persons/entities shall be obliged to take measures to enforce the right to objection.

5.3. If the Data Subject disagrees with the decision on their objection, or if the Data Controller fails to comply with the deadline for the decision, the Data Subject

may appeal to the courts within thirty (30) days of the notification of the decision or the last day of the deadline for such decision.

VII. Enforcement possibilities in relation to data management

In the event of a breach of their rights, Data Subjects may bring the matter before a court or the data protection authority.

1. Data protection authority

Any person may lodge a complaint with the data protection authority to initiate an investigation on the grounds that there has been or is an imminent threat of a breach of rights in respect of the processing of personal data.

Competent authority:

National Authority for Data Protection and Freedom of Information

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

Mailing address: 1363 Budapest, Pf.: 9.

Telephone number: +36 1 391 1400

Fax number: +36 1 391 1410

E-mail address: ugyfelszolgalat@naih.hu

Website: www.naih.hu

2. Initiation of legal proceedings

Data Subjects may initiate a civil action against Semmelweis Kft. in the event of unlawful data processing that they experience. The competent court to hear the lawsuit is the court of law of the seat of the Data Controller. The lawsuit may also be brought before the court of the Data Subject's place of residence, at the Data Subject's option (for a list of courts and their contact details, please see the information available at the following link: <http://birosag.hu/torvenyszekek>).