

## Innovation Hub – Data Protection Guide

When visiting [www.mnb.hu/innovation-hub](http://www.mnb.hu/innovation-hub), the Magyar Nemzeti Bank (MNB) is the responsible custodian of your data.

When you visit the home page of the Innovation Hub, if you use the “Regulatory Support Platform”, “Communication Hub” and “Regulatory Sandbox” service, you need to specify your personal and business data.

Your personal data (all data that can be associated with your person) may come into our custody in one of the following ways:

- on the one hand, if you provided the following data to us voluntarily, when using the service called
  - “Regulatory Support Platform” or “Communication Hub” your name, your contact details, the names and positions of the executive officers of your enterprise;
  - “Regulatory Sandbox” your name and contact details during submitting a request with the aim of participating in preliminary consultation;
- on the other hand, associated with the maintenance of the Internet connection, technical data related to the computer, browser, Internet address used by you and the web sites visited by you will be automatically generated in our competitor system.

If you provide any of your personal data to the MNB, by that you give your consent to the MNB to keep on record and manage these data, in order to ensure the efficient operation of the “Regulatory Support Platform”, the “Communication Hub” and the “Regulatory Sandbox” during the existence thereof. Providing personal data is not based on any legal provisions or on contractual obligation, and it is not a prerequisite for signing any contracts. The MNB shall treat any personal data disclosed to it in the use of the website pursuant to the provisions of the General Data Protection Regulation (GDPR) and of the Act CXII of 2011 on Informational self-determination and freedom of information (Info Law). Accordingly, the MNB shall retain the personal data provided by you only for the time and to the extent necessary for the accomplishment of the purpose of data retention.

Data sent for the MNB while using the “Regulatory Support Platform” related to the questioners name, electronic contact details (website, e-mail address), and the names and positions of the chief executives of the company is handled by MNB with the aim of contacting, as long as it is justified by the aim of contacting. If you do not give these informations while completing the questionnaire, the MNB will not accept your request.

Data sent for the MNB while using the “Communication Hub” related to the company’s name, electronic contact details (website, e-mail address) is handled by MNB, the MNB also publishes it on the site “Innovation Hub” to make it possible for all interested person to get information about the company, to contact with the company, and to be able to ask for help from others than the MNB; the MNB handles these information as long as it is justified by the aim mentioned before. The MNB do not handle your information in the further if you withdraw your consent. If you do not give these informations, the MNB do not publish it on the site “Innovation Hub”.

From data sent for the MNB while using the “Regulatory Sandbox” related to initiating preliminary consultation, the name of the contact person and the contact details of the contact person (website, e-mail address) is handled by MNB with the aim of contacting, as long as it is justified by the aim of contacting.

The MNB shall never divulge the data disclosed to it to any third party under any circumstances, with the exception of the cases defined by law. In such a case defined by law, that the MNB may retain the personal data provided by you after the withdrawal of your approval, if continued data retention is necessary for the fulfilment of a legal obligation applying to the MNB or for the enforcement of a legitimate interest, and if it is in proportion with the restriction of the right to the protection of personal data.

The MNB does not use the services of external entities (data processing agents) for the operation of the website, including the handling of the data of visitors.

Persons authorized for handling the personal data provided by you are those employees of the MNB who participate in the provision of the “Regulatory Support Platform”, “Communication Hub” and “Regulatory Sandbox” of the MNB.

The MNB shall treat data of a personal nature provided by you through the Internet with the same level of security protection as the protection of data provided by other means.

The MNB uses so-called “cookies” in order to increase the quality of its services and to address the security and data protection risks properly. A cookie is a small set of data that this website stores in the browser of your computer and may read out from there. Only that website is capable of reading the cookie which placed it. The MNB uses cookies for administrative purposes, such as measuring visits to the website. None of the cookies contains any personal data that would enable anyone to access you by email, on telephone or by regular mail. The browser can be set to send you a programme message whenever cookies are placed, or to prevent the placement of cookies.

In order to analyse user behaviour while browsing the website, the MNB uses web beacons obtained from Yahoo! and Google. Both Yahoo! and Google may use anonymous information collected from this and other websites for the development of their products, services, furthermore, for referring advertisements that are relevant for you. If you want to find out more about this practice or about your opportunities to prevent Yahoo! and Google from using the information obtained about you, please click [here](#).

### **The rights of the data subject**

#### **Right to information an access to data:**

The data subject can ask for information in a written form through contact channels given under Section 3. about:

- what personal data is processed,
- what is the legal basis of the processing,
- what is the purpose of the processing,
- what is the source of the information,
- what is the period for handling information,
- is data is still processed,
- for whom, when, with what purpose and which personal data was processed to third parties.

Also the data subject can ask the MNB to provide a copy of the personal data undergoing processing.

The MNB fulfills its obligation based on the data subjects request within 30 days by sending the informations as an answer to the address given within the contact details. If the request was sent by electronic means, the MNB sends the answer by electronic means, if it is possible. If you would like to get the answer by an other mean, please inform us in your request about this.

#### **Right to rectification:**

The data subject can ask in a written form through contact channels given under Section 3. the MNB to modify or clarify the personal data (e.g.: name, e-mail address, if it has changed) related to him/her. If the request is sent by an electronic mean, the MNB sends the answer by electronic means, if it is possible. If you would like to get the answer by an other mean, please inform us in your request about this.

The MNB fulfills its obligation based on the data subjects request without undue delay within 30 days and informs about this the data subject on tha contact channel given by him/her for this purpose.

#### **Right to erasure (“right to be forgotten”):**

The data subject can ask in a written form through contact channels given under Section 3. the MNB to erase personal data related to him/her.

The request for erasing personal data is refused by MNB, if legal provisions obligate MNB to store the personal data. If there is no legal obligation to store the personal data, the MNB without undue delay within 30 days fulfils its obligation to erase personal data and informs in its answer the data subject about this fact on the communication channel given by him/her for this purpose. If the request is sent on an electronic mean, the MNB sends the answer – if it is possible – on an electronic mean. If you would like to get the answer by an other mean, please inform us in your request about this.

#### **Right to restriction of processing:**

The data subject can ask in a written form through contact channels given under Section 3. the MNB to restrict the processing of data. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent, for the establishment, exercise or defence of legal claims or for reasons of important public interest.

Restriction of processing can be asked if you:

- think your personal data is not punctual,
- think the MNB processed your data in an unlawful way, but you do not want the MNB to erase your data,
- would like the MNB to process your data for further related to the protection or pursuing your legal claim, but the MNB no longer needs this data.

The MNB without undue delay within 30 days fulfils its obligation and informs in its answer the data subject about this fact on the communication channel given by him/her for this purpose. If the request is sent on an electronic mean, the MNB sends the answer – if it is possible – on an electronic mean. If you would like to get the answer by an other mean, please inform us in your request about this.

#### **Right to data portability:**

The data subject can ask in a written form through contact channels given under Section 3. from the Bank to that the data provided by him/her and processed electronically be sent to him/her by the MNB or to another data controller designated by it. The right to data portability therefore does not extend to data stored on paper. The data carrier authority does not automatically delete the data, nor does it affect the retention period of the transmitted data at the MNB.

The MNB without undue delay within 30 days sends the electronically stored data in a structured, commonly used and machine-readable format. If the MNB sends the data to another data controller, it shall notify the data subject thereof by sending a letter to the contact details provided by the data subject. If the request is sent on an electronic mean, the MNB sends the answer – if it is possible – on an electronic mean. If you would like to get the answer by an other mean, please inform us in your request about this.

#### **The right to withdraw consent:**

The data subject can withdraw his or her consent to the data processing in a written form at any time during the data processing period through contact channels given under Section 3. In the event of the withdrawal of the consent, the MNB's data management prior to the withdrawal will remain lawful.

The MNB shall delete the personal data without undue delay after the receipt of the withdrawal and shall notify the person making the declaration thereof by sending a letter to the contact details provided by the data subject. If the request is sent on an electronic mean, the MNB sends the answer – if it is possible – on an electronic mean. If you would like to get the answer by an other mean, please inform us in your request about this.

#### **Judicial remedy:**

If in your opinion data retention did not comply with the legal requirements, you may refer the matter to a court.

In addition, an investigation may be initiated by filing a report to the National Authority for Data Protection and Freedom of Information on the grounds that there was an infringement in practising the rights related to personal data management or there is imminent danger thereof.

Contact information to National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information

Seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf. 5.

Telephone number: 06-1-391-1400

Telefax: 06-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Contact details of the data controller: MNB – INNOVATION HUB

Email: [innovationhub@mnb.hu](mailto:innovationhub@mnb.hu)

Telephone: +36 1 428 2600/1295

Mailing address: Magyar Nemzeti Bank, 1850 Budapest