



**UNIFIED DATA PROTECTION POLICY AND NOTICE**  
**OF THE 52<sup>ND</sup> INTERNATIONAL EUCCHARISTIC CONGRESS**  
with relation to the control and procession of data collected through their website

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Last modified: 13 April 2021

## 1. Protection of personal data, principles

Our aim is to prepare in a worthy manner for the 52nd International Eucharistic Congress in Budapest.

We are convinced that human dignity is inviolable, since God created mankind ‘in His own image and after His own likeness’.

The acknowledgment and the protection of human dignity include the protection of personal data. Naturally, we take all necessary measures to ensure the protection of this data at the highest level possible and to comply with all legal requirements. Accordingly, we process data solely with the appropriate legal basis and for the specified purpose(s), in compliance with the relevant legislation, including, but not limited to, the provisions of Act CCVI of 2011 on the right to freedom of conscience and religion and the legal status of churches, denominations and religious communities (‘Church Act’), Act CXII of 2011 on the right of informational self-determination and on the freedom of information (‘Privacy Act’), and REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE 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 (‘GDPR’).

We will process your personal data for a period no longer than which is absolutely necessary for achieving the purposes specified in the present Policy. We only deviate from the foregoing if the relevant legislation prescribes the processing of data for a period longer than the foregoing.

Principles relating to processing of personal data:

Personal data shall be;

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject (**‘lawfulness, fairness and transparency’**);
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (**‘purpose limitation’**);
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**‘data minimisation’**);
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (**‘accuracy’**);
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; (**‘storage limitation’**);
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (**‘integrity and confidentiality’**).

The Data Controller acts with regard to the above principles during all their data processing and takes all necessary measures to be able to demonstrate compliance with the principles relating to processing personal data (**‘accountability’**).

Legal basis for the processing of personal data:

Data processing may only be carried out if an appropriate legal basis is available. Without an appropriate legal basis no legitimate data processing can be carried out.

Such legal basis can be:

- if data processing is based on a law, i.e. it is necessary for the Data Controller to fulfill legal obligations (eg. complying with fiscal or accounting obligations)
- if the data subject has given consent to the processing of his or her personal data for one or more specific purposes (eg. consent to sending newsletter)
- if processing is necessary for the purposes of the legitimate interests pursued by the controller (such as data processing for marketing purposes)
- if processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (such as fulfilling conference participation contract)
- processing is necessary to protect the vital interests of the data subject or of another natural person (such as in case of measures of disease control)

## 2. Definitions

**Data processor:** is a natural or legal person, public authority, agency or other body that processes Personal Data on behalf of a Data Controller. A data processor is never part of the data controller's organisation.

**Data processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Restriction of data processing:** means the marking of stored personal data with the aim of limiting their processing in the future;

**Data controller:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Personal data breach:** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.



**Pseudonymisation:** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**Consent of the Data Subject:** consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or.

**Identifiable natural person:** one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Recipient:** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**Data subject:** a natural person identified or identifiable by any information.

**Third party:** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**Law/legal obligation:** Hungarian and European Union laws in force.

**Special categories of personal data (sensitive data):** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation:

- (a) genetic data: personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;



- (b) biometric data: personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- (c) data concerning health: means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

**Profiling:** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**Personal Data:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 3. Data Controller

Data Controller: **General Secretariat of the International Eucharistic Congress in Budapest**  
Seat: 1064 Budapest, Vörösmarty utca 40., Hungary  
Postal address: 1397 Budapest, Pf. 523, Hungary  
Email: [titkarsag@iec2020.hu](mailto:titkarsag@iec2020.hu)  
Telephone: +36 1 605 4972

### 4. Data Protection Officer – name and contact data

Data Protection Officer: dr. Csaba Szabó  
Postal address: 1054 Budapest, Báthori u.20., Hungary  
Email: [data@drszabocsaba.com](mailto:data@drszabocsaba.com)



## 5. Processed Personal Data

<b>Name of Data Procession</b>	<b>Purpose of Data Procession</b>	<b>Legal Basis of Data Procession</b>	<b>Scope of Processed Data</b>	<b>Duration of Data Procession</b>
Personal data processed in relation with website operation. When visiting the website certain technical data will be automatically recorded (eg. those data of your computer, that are generated during the use of our services). Data Controller does not connect these data with your other personal data – except for cases under legal obligations.	Purpose of data procession is to make the website remember important information that make the use of the site more convenient. The Data Controller uses the cookies primarily for improving the system. The Data Controller monitors, for example, the number of visitors to the Website, by means of anonymous aggregates. The Data Controller also uses the cookies to remember you when you return to the Website, to record which event you registered for, and to handle certain traffic data.	Consent of the data subject, GDPR Article 6 Paragraph 1 a)	Cookies, IP-addresses	Personal data will be beleted with the withdrawal of the Data Subject’s consent or with the end of the International Eucharistic Congress.



<b>Name of Data Processing</b>	<b>Purpose of Data Processing</b>	<b>Legal Basis of Data Processing</b>	<b>Scope of Processed Data</b>	<b>Duration of Data Processing</b>
Data control during contact	Purpose of data control is for the Data Controller to be able to answer/react to your questions and requests, and thus comply as far as possible with the request.	Consent of the data subject, GDPR Article 6 Paragraph 1 a)	Any personal data that you, as the data subject, provide to the Data Controller during the contact.	The Data Controller processes the personal data until the question is answered or until the request submitted by you is fulfilled or your consent is withdrawn. Thereafter, all personal data you provide will be permanently and irrevocably deleted.
Data processing in connection with adorations organized by IEC2020	Purpose of data management is to ensure participation in the adoration, registration and identification of the participants.	Consent of the data subject, GDPR Article 6 Paragraph 1 a)	First name and last name, email address, date of birth, name of the diocese/church organisation the data subject is a member of	The personal data will be deleted upon the withdrawal of the data subject's consent or upon completion of the adoration.
Data processing in connection with sending newsletters	Notification of data subjects about the programs of the Data Controller, sending information on the recent news of the International Eucharistic Congress	Consent of the data subject, GDPR Article 6 Paragraph 1 a)	Name, email address	The personal data will be deleted by the withdrawal of the data subject's consent.



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Data processing in connection with the registration for First Communion	Ensuring participation in the First Communion, registration of the first communicants.	Consent of the data subject, GDPR Article 6 Paragraph 1 a)	First communicant: name (first name, last name), sex (boy/girl), date of birth (year, month, day), Parish contact: name, mobile phone number, parish priest or religion teacher	All personal data will be deleted by the withdrawal of the data subject's (or, in case of a minor data subject) his/her legal representative's consent or upon completion of the First Communion
Processing pictures, audio and video recordings for marketing and security purposes	The purpose of the data processing is to advertise and popularise the events of the Data Controller and/or the Congress, specifically to disclose pictures at the website of the Congress and in other media, press and promotional materials connected to the Congress and to ensure security of the Congress venues, prevent and detect any infringements, to collect evidences to support basis of legal procedures.	Legitimate interest of the Data Controller, GDPR Article 6 Paragraph 1 f)	Image, audio and video recordings	5 years after the end of the International Eucharistic Congress. After that all personal data will be deleted. All security related recordings will be deleted within 90 days after the end of the Congress.

From the image and video recordings, the Data Controller selects those suitable for their marketing purposes, the rest is stored and managed only for the purpose of justifying governmental funding, for the period specified above. We would like to emphasise that the Secretariat does not intend to show specific persons in its marketing materials, however, it is possible that you may recognise your likeness in certain pictures, audio and video recordings. In the case of the forwarding of data, the Data Controller records the reason for and the date of accessing the data and/or maintains a data forwarding register of these in compliance with the relevant legislation. Given that the data processing is based on the legitimate interest of the Data Controller, the Data Controller undertakes not to make or use image and sound recordings of the data subject that would violate the human dignity of the data subjects or on which the data subject is depicted in a position, which is likely to adversely affect the data subject.





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Data processing in connection with volunteering and creating account in the volunteer management system	Helping effective and efficient conducting of the International Eucharistic Congress, recruiting and registering volunteers	<p>Regarding registration, and login into the Volunteer Management System: explicit consent of the data subject, GDPR Article 6 Paragraph 1 a)</p> <p>Regarding performance of volunteering agreement GDPR Article 6 Paragraph 1 b),</p> <p>Regarding special personal data: the above and GDPR Article 9 Paragraph 2 d) as exception category of cases</p>	<p>Regarding registration: data contained in the application form for volunteers: first and last name, diocese, special needs (e.g. in case of an impaired person), dietary needs, e-mail address</p> <p>For the access to the event venues: profile picture, ID number</p> <p>Regarding the performance of the Volunteering Agreement: first name, last name, date and place of birth, name of mother, nationality, e-mail address, mobile phone number, residence and mailing address, spoken languages, undertaken tasks, time offered, previous experiences as volunteer, volunteering hours.</p>	<p>The personal data handled based on consent will be deleted by the withdrawal of the data subject's consent, but latest after the International Eucharistic Congress.</p> <p>Personal data handled based on performance of the agreement will be deleted 8 years after the agreement is terminated (to enable financial audits).</p>

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Data processing in connection with registration and ticket purchasing on the registration site.	Ensuring participation in the 52nd International Eucharistic Congress, helping registration for the Congress and enabling ticket purchase.	Consent of the data subject, GDPR Article 6 Paragraph 1 a)	Email address, password, first name, last name, spoken language, church title (in case of clericals). After creating a profile, in order to carry out ticket purchase: date of birth, mobile phone number, nationality, sex, membership in an order/society, address, information on impairedness, in case of certain events: place of birth, ID card number or name of mother.	The personal data will be deleted by the withdrawal of the data subject's consent, or after the International Eucharistic Congress.
Data processing in connection with conferences or events	Enabling participation in conferences and events organised in connection with the 52nd International Eucharistic Congress	Consent of the data subject, GDPR Article 6 Paragraph 1 a)	Personal data necessary to conduct the given conference or event, typically: first name, last name, email address, date of birth, mobile phone number, postal address, diocese/church organisation. The scope of the personal data processed in relation with the given conference or event shall be defined on the landing page of the given event or conference.	The personal data will be deleted by the withdrawal of the data subject's consent, or after the given conference or event.

## 6. Recipients of data handling, data processors

Description of Recipient	Purpose of data transfer
<p><b>COMPOFFICE-R KFT</b> Seat: 2030 Érd, Festő utca 93. Business premises: 1141 Budapest, Benkő utca 10-14. Company registration number: 13 09 096805 Tax number: 13155478-2-13,</p>	Equipment provider, operation of registration system
<p><b>rentIT KFT</b> Seat: 2030 Érd, Festő utca 93. Business premises: 1141 Budapest, Benkő utca 10-14. Company registration number: 13 09 155650 Tax number: 23894930-2-13,</p>	Equipment provider, operation of registration system
<p><b>KBOSS.hu Kft. (Számlázz.hu)</b> Seat: 1031 Budapest, Záhony utca 7., Company registration number: 01-09-303201, Tax number: 13421739-2-41,</p>	Operator of the online billing program
<p><b>OTP Mobil Kft. (SimplePay)</b> Seat: 1093 Budapest, Közraktár u. 30-32., Company registration number: 01-09-174466, Tax number: 24386106-2-43,</p>	Online purchasing platform and service provider. On our registration site you may pay by credit card using SimplePay application of OTP Mobil Kft. In case of payments our site directs you to the website of the service provider, and so the personal data you submitted during the purchase will be handled by OTP Mobil Kft., and not the Data Controller. Data Controller does not accept any liability for the data control practice of OTP Mobil Kft. Privacy notice of the service provider is available at the following link: <a href="https://simple.hu/privacy-notice/">https://simple.hu/privacy-notice/</a>
<p><b>eVisit Hungary Kft.</b> Seat: 1095 Budapest, Soroksári út 48. Company registration number: 01-09-952138 Tax number: 23083439-2-43</p>	Web hosting service provider, handling and sending out newsletters
<p><b>SmartMBSE Kft.</b> Seat: 1024 Budapest, Rómer Flóris utca 4. Company registration number: 01-09-193747 Tax number: 24997610-2-41</p>	System operations (registration systems for preparatory conferences, first communion and worldwide adorations)
<p><b>Civil Partner Kft.</b> Seat: 1112 Budapest, Vadon utca 28. Company registration number: 01 09 700351 Tax number: 12723571-2-43</p>	System operations (registration systems for preparatory conferences, volunteers and VIPs)



Description of Recipient	Purpose of data transfer
<p><b>Bithuszárok Számítástechnikai és Szolgáltató Betéti Társaság</b> (ListaMester) Seat: 2051 Biatorbágy, Damjanich utca 8. Company registration number: 13-06-065996 Tax number: 21158218-2-13</p>	Handling and sending out newsletters
<p><b>Lakatos János e.V.</b> Seat: 8721 Pilis, Malom utca 13. Company registration number: 55579928 Tax number: 56880489133</p>	operation of volunteer management system

The server on which the Website is located and the collection of data is technically performed is the server located at Pázmány Péter Catholic University (1088 Budapest, Szentkirályi str. 28.) and the servers used by the above-mentioned data processors.

The Website may contain information originating from third parties not related to the Data Controller. It may happen that these third parties also place content, cookies, web-beacons on the user’s computer, or collect data using similar technologies. In these cases, the data protection rules laid down by these third parties are applicable to the data processing, and the Data Controller accepts no liability with regard to such data processing.

The Data Controller accepts no liability for the content, data and information protection practices of external websites accessible from the Website via links. If the Data Controller becomes aware of the fact that a website linked by it or a linking violates any right of any data subject or the law, it removes the link from the Website without delay.

## 7. Data security measures

In order to guarantee the appropriate level of data security, Data Controller has assessed in its internal data protection regulation the risks connected to their processing of personal data and evaluated them by the severity of the risk and the probability of its occurrence from multiple aspects.

In connection with its websites the Data Controller ensures that the necessary authorisations, internal organisational measures and technical solutions are present in the course of operating the IT systems, in order to prevent unauthorised persons from acquiring your data, erasing your data, saving your data from the system, or

modifying your data. We ensure that our data processors also comply with the data protection and data security requirements.

We maintain a register of possible personal data breaches, if necessary, we inform you about the actual data breaches.

The Data Controller uses password protection on its computers and provides firewall protection for its IT devices.

The Data Controller provides the computers owned by them with an appropriate password and anti-virus program.

During the registration on the Data Controller's website and when applying for tickets for the International Eucharistic Congress, Data Controller applies a so-called dual opt-in system, i.e. ensures that data subjects has the possibility to confirm their application from their email account.

In order to secure the password provided by the data subject when creating an account on the registration site of the International Eucharistic Congress, the Data Controller requires that the password should be at least 8 characters long and contain at least 1 uppercase letter and 1 number.

In the case of the forwarding of data, the Data Controller records the reason for and the date of accessing the data and/or maintains a data forwarding register of these in compliance with the relevant legislation.

## 8. Rights of Data Subjects

You are entitled to request information about personal data related to you and processed by us, at any time, via mail, electronic means, or telephone, at any of our contact details provided in the notice.

Upon your request we inform you about

- the data processed,
- the purpose of the data processing,
- its legal basis,
- its duration,
- who and for what purpose receive or have received your data.

We inform you within 25 days from the submission of the request, in a written form, either in paper or via electronic means (depending on the form of the request).



You are entitled to **object** to the processing of your personal data at any time. We examine the objection at the earliest opportunity following its submission, but within 25 days at the latest, decide whether it is well-founded, and inform you about our decision.

You are entitled to request the **deletion** of the personal data we process, or the **rectification** of inaccurately recorded personal data at any time.

In addition, we **make** your personal data **inaccessible** if you request so, or if, based on the information available to us, it can be presumed that the erasure would jeopardise your legitimate interests. We process the personal data made inaccessible in this manner for as long as the purpose for the processing of the data or the legitimate interest preventing the erasure of the personal data exists.

The data subject is entitled to request the Data Controller, in writing and at the contact details provided in the present notice, to **restrict** the processing of their personal data (by unambiguously indicating the restricted manner of the processing of data and ensuring that the data in question is processed separately from other data) if

- the data subject contests the accuracy of their personal data (in this case, the Secretariat restricts the processing of the data to the period required for checking the accuracy of the personal data;
- the data processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data Controller no longer needs the personal data for the purposes of the data processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the data processing (in this case, the restriction applies until it is established whether the legitimate grounds of the data controller override the legitimate grounds of the data subject).

You are entitled to receive, at the contact details provided in the present notice, the personal data concerning you, which you have provided to the Data Controller, in a structured, commonly used, and machine-readable format, and you are entitled to transmit this data to another data controller without any hindrance from the Data Controller.



We comply with any request to access, erase, rectify, restrict access to, transport any data, and make any data inaccessible at the earliest opportunity, but within 25 days at the latest, and we inform you. If we are unable to comply with your request, we inform you within 25 days in this case as well.

If we have transferred the data to another person with your consent, we also inform the addressee of the data transfer about the necessary steps.

If we process your personal data based on your consent, you have the right to **withdraw your consent** at any time. You can withdraw your consent by contacting the Data Controller or the Data Protection Officer at the contact details set out in this document, or if this is justified - e.g. in case of a newsletter - the Data Controller ensures simpler ways to withdraw your consent (eg. by sending "Unsubscribe" link in the newsletter).

**If you are visually impaired or elderly, you may ask the Data Controller - through the contact details set out in this Privacy Policy or the Data Protection Officer - to make the content of the Privacy Policy available for you in text format or in capital letters.**

In addition, **you are entitled to submit your complaint to the: Hungarian National Authority for Data Protection and Freedom of Information**

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

[www.naih.hu](http://www.naih.hu),

Phone: +36 (1) 391-1400

Telefax: +36 (1) 391-1410

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

or to **assert your rights** related to the processing of personal data **in the court of jurisdiction** that you find under the following link:

<https://birosag.hu/birosag-kereso>



You are entitled to exercise your rights listed in the present notice at any time, if you contact the Data Controller or the Data Protection Officer in e-mail or in any other written form. Concerning your request, it may be necessary to have the person submitting the request identify themselves or to provide other such data which relate to them, and justify their right. We handle the request in compliance with the relevant data protection legislation.

You can contact the Data Controller via the contact details provided in Section 3 of this document or through the Data Protection Officer, whose contact details are set out in Section 4 of this document.

**General Secretariat of the International Eucharistic Congress in  
Budapest**

Data Controller