

# PRIVACY NOTICE

## Introduction

The Defence Innovation Research Institute Nonprofit Private Company Limited by Shares, as data controller (hereinafter referred to as the “Data Controller”) hereby informs Data Subjects about the processing of their personal data in accordance with 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 (hereinafter: General Data Protection Regulation or GDPR).

The website accessible at the domain name <https://defenseinnovation.hu/#> (hereinafter referred to as the Website) qualifies as the Data Controller's own website.

The Data Controller acknowledges that the content of this legal notice regarding data processing carried out within the scope of its activities is binding upon it. The Data Controller reserves the right to amend this Privacy Notice any time. The Data Controller shall publish the current version of the Notice on its website. The Data Controller shall treat personal data confidentially and securely and shall make the necessary improvements and modifications in line with changes in legal and technical possibilities.

By using the Website, the User accepts the provisions of this Notice. Therefore, please read this Notice carefully before using the Website. The User gives their consent to each data processing by voluntarily providing the data in question.

## Terms

**“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;

**“Data Controller”**: means furthermore the natural or legal person, or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

**‘processor’** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**“transfer of data”** means the making available of personal data to a specified recipient;

**“personal data breach”**: personal data breach means a breach of security related to the processing of personal data leading to the accidental or unlawful destruction, loss, alteration,

unauthorised disclosure of, or access to, personal data transferred, stored or otherwise processed;

**“identifiable natural person”** means a natural person can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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.

**“health data”**: personal data relating to the physical or mental health of a natural person, including data relating to the provision of health services to a natural person which contains information about the health of the natural person;

**“Data Subject”** means any Data Subject or natural person identified or identifiable on the basis of any information;

**“consent of the data subject”** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them;

**‘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;

**“sensitive data”** means 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;

**“personal data”**: any information relating to the data subject

## **1. Details of the Data Controller**

Name:	Defence Innovation Research Institute Nonprofit Ltd.
Registered office:	H-1123 Budapest, Alkotás utca 50. A. ép. 6-7. em.
Mailing address:	H-1123 Budapest, Alkotás utca 50. A. ép. 6-7. em.
E-mail address:	<a href="mailto:info@defenseinnovation.hu">info@defenseinnovation.hu</a>
Website:	<a href="https://defenseinnovation.hu/#">https://defenseinnovation.hu/#</a>

## **2. Contact details of the Data Protection Officer**

Data protection officer:	Dr. Szabó Zsófia
E-mail address:	<a href="mailto:dpo@defenseinnovation.hu">dpo@defenseinnovation.hu</a>

### 3. Scope of personal data processed (name of activity)

- **Data collected from visitors to the website:** identification number, date and time of visit, IP address of the user's computer at the time of visit.
- **Data of newsletter subscribers:** name of the data subject, email address.
- **Data processed in connection with company registration/questionnaire completion:** the Data Subject's telephone number, email address, name, position.
- **Data processed in connection with applications:** Name, address, position, tax number, telephone number, and email address of the Data Subject.
- **Data of participants in licensed training courses:** name of the Data Subject, their birth name, mother's name, place and date of birth, address, educational qualifications, email address, telephone number.
- **Data of event participants:** name, email address, image and audio recording of the Data Subject.
- **EDF Chatbot conversations data:** identification data voluntarily provided by the Data Subject (name, email address, telephone number – optional), IP address, unique identifier of the chat session (Chat ID), and the content of conversations (questions) and message exchanges.

### 4. Purposes of data processing

- In connection with data processing related to the website, the purposes of data processing are: use of the website, monitoring the operation of services during visits to the website, and prevention of misuse.
- In connection with data processing related to newsletters, the purposes of data processing are: identifying the User, enabling subscription to the newsletter, sending newsletters, and performing technical operations.
- In connection with data processing related to company registration/questionnaire completion, the purposes of data processing are: business and professional relations, requesting information, sending invitations and information about company events (exhibitions, events, training, etc.).
- In connection with data processing related to applications, the purposes of data processing are: application registration, submission of applications.
- In relation to participants in licensed training courses, the purposes of data processing are as follows: Compliance with the obligation to report data to the adult education data reporting system.
- In relation to event participants, the purposes of data processing are: to disseminate information about the Company, to present its activities, and to reach new partners.
- In connection with the EDF chatbot service, the purpose of data processing is to provide effective information to service users, support administration, ensure the operation of the service, troubleshoot errors, and develop the chatbot.

### 5. Legal basis for the data processing

- In relation to data processing in connection with the website, the legal basis for data processing is: the voluntary consent of the Data Subject [Article 6 (1) (a) of GDPR].

- In relation to data processing in connection with the newsletter, the legal basis for data processing is: the voluntary consent of the Data Subject [Article 6 (1) (a) of GDPR].
- Legal basis for data processing in connection with data processing related to company registration/questionnaire completion:  
voluntary consent of the Data Subject [Article 6 (1) (a) of GDPR].
- Legal basis for data processing in connection with data processing related to applications: voluntary consent of the Data Subject [Article 6 (1) (a) of GDPR].
- In relation to participants in licensed training courses, the legal basis for data processing: Completion of legal obligations: Article 6 (1) (c) of GDPR, with account to the following legislation: Act LXXVII of 2013 on adult education
- In relation to data processing in connection with event participants, the legal basis for data processing is: the voluntary consent of the Data Subject [Article 6 (1) (a) of GDPR].
- In relation to data processing in connection with the EDF chatbot service, the legal basis for data processing is: the voluntary consent of the Data Subject [Article 6 (1) (a) of GDPR].

## **6. Source of personal data**

In relation to data processing purposes set out above, the source of the personal data is the Data Subject.

## **7. Duration of data processing**

- In connection with data processing related to the website: data processing lasts for 30 days.
- In connection with data processing related to the newsletter: data processing lasts until the deletion request of the Data Subject.
- In connection with data processing related to related to company registration/questionnaire completion: data processing lasts until the deletion request of the Data Subject.
- In connection with data processing related to applications:
  - The data of applicants who did not receive support shall be retained for a maximum of three years following registration, after the decision on support has been made;
  - In other cases, as specified in the call for applications;
  - At the end of the fifth year following the termination of the contract concluded as a result of the application (general civil law limitation period)
- In connection with data processing related to licensed training courses: until the last day of the eighth year following the conclusion of the adult education contract.
- In connection with data processing related to event participants: data processing lasts until the deletion request of the Data Subject.
- In connection with data processing related to the EDF chatbot service: data processing lasts until the deletion request of the Data Subject.

## 8. Recipients of personal data

In connection with all data processing for the purposes set out in clause 4, personal data may be processed by the employees of the data controller authorised to do so based on the provisions included in this notice.

## 9. The processors used

The Controller has the right to engage the services of a processor for the performance of its activities.

Data processors shall record and process any personal data transferred to them and managed or processed by the Data Controller in accordance with the provisions of the GDPR, and shall issue a corresponding statement to the Data Controller.

In the course of operating the IT system, sending newsletter, the Data Controller employs the following Data Processor:

### **Hosting service provider**

1. Activities performed by Processor: Hosting service

2. Name and contact details of the data processor:

Name:	<b>23VNET Kft.</b>
Registered seat:	H-1094 Budapest, Liliom utca 24-26. II/5.
Email:	<a href="mailto:info@hostit.hu">info@hostit.hu</a>
Web:	<a href="https://hostit.hu/">https://hostit.hu/</a>

3. Data Subjects involved: visitors to the Website, recipients of the newsletter, those who fill out the company registration form, questionnaires, or statements related to applications, as well as participants in licensed training courses and other events organized by the Company.

### **EDF Chatbot service**

In connection with the Chatbot service, the Data Controller employs the following Data Processor:

1. Activities performed by Processor: When using the EDF chatbot service, questions are processed and responses are generated by Google Gemini's artificial intelligence-based language model.

2. Name and contact details of the data processor:

Name:	<b>Google LLC</b>
Registered seat:	1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
E-mail:	<a href="https://about.google/company-info/contact-google/">https://about.google/company-info/contact-google/</a>
Web:	<a href="https://www.google.com/">https://www.google.com/</a>

3. Data Subjects involved: users of the EDF Chatbot service

## **10. Rights of the data subject related to data processing**

### *10.1. Right to access*

The data subject may request in writing that the Data Controller provide information on:

- what personal data;
- under what title;
- for what purpose of processing;
- are processed by it, from what source (if the data was not collected by the Data Controller from the data subject);
- the period such personal data are stored, or, if this is not possible, the criteria based on which this period is established;
- the recipients with whom the personal data has been or will be shared by the Data Controller, including
- in particular recipients in third countries or international organizations;
- where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 of GDPR relating to the transfer;
- the right to lodge a complaint with the supervisory authority;
- the fact of automated decision-making and, in this context, the significance of data processing and the consequences thereof for them.

If the right of access by the Data Subject may result also in a realisation of damage or interference with the rights and freedoms of other natural persons, in particular the business secrets and intellectual property of others, the Data Controller is entitled to refuse to fulfill the request in a necessary and proportionate manner.

If the Data Controller does not process the personal data indicated by the Data Subject, the Data Controller shall inform the Data Subject thereof in writing.

### *10.2. Right to rectification*

The data subject may request in writing, without providing reasons, that the Data Controller correct inaccurate personal data concerning them or, if compatible with the purpose of the processing, supplement any personal data. The Data Controller shall inform those to whom the personal data have been disclosed of any rectification of personal data, unless this proves impossible or involves a disproportionate effort. The Data Controller shall inform the Data Subject about those recipients if the Data Subject requests it.

### *10.3. Right to restriction of processing*

The data subject may request in writing that the Data Controller restrict the processing of their personal data if any of the following conditions apply:

- a) the data subject contests the accuracy of the personal data, in which case the restriction applies for
- b) a period of time which allows the accuracy of the personal data to be verified by the Data Controller;
- c) the data processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use;

- d) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- e) the data subject has objected to the data 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);
- f) it is ordered by the supervisory authority.

If the processing of any personal data is restricted, such personal data, except for storage, may only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the European Union or of a Member State. The Data Controller shall inform the Data Subject before the restriction of processing is lifted.

The Data Controller shall inform those to whom the personal data have been disclosed of any restriction of processing of personal data, unless this proves impossible or involves a disproportionate effort. The Data Controller shall inform the Data Subject about those recipients if the Data Subject requests it.

#### *10.4. Right to data portability*

The Data Subject shall have the right to receive the personal data concerning them, which they have provided to a Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance from the Data Controller.

Right to data portability may be exercised in the case of personal data which have been provided by the Data Subject to the Data Controller, and

- data processing is based on the voluntary consent of the Data Subject or on a contract to which the Data Subject is a party; and
- the processing is carried out by automated means.

If the Data Subject's right to data portability may result also in a realisation of damage or interference with the rights and freedoms of other natural persons, in particular the business secrets and intellectual property of others, the Data Controller is entitled to refuse to fulfill the Data Subject's request to the necessary extent.

Measures taken by the employer within the framework of data portability do not include the deletion of data, the Data Controller records such data until the Data Controller has an appropriate purpose or legal ground for data processing

#### *10.5. Erasure of personal data, right to restriction, objection*

##### **Right to erasure**

- 1) The Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay and the Data Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) The personal data indicated by the Data Subject are no longer necessary for the purposes for which they were collected or otherwise processed;
  - b) The Data Controller processed personal data based on the consent of the data subject and the Data Subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
  - c) The Data Subject objects to the processing of data for reasons related to their particular situation or because of data processing for direct marketing purposes, and there are no overriding legitimate grounds for the processing;
  - d) the personal data have been unlawfully processed;
  - e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Controller is subject;
  - f) the personal data are collected in connection with the provision of information society services provided directly to children.
- 2) Where the Data Controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the Data Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform data controllers which are processing the personal data that the Data Subject has requested the erasure by such data controllers of any links to, or copy or replication of, those personal data.
- 3) Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:
- a) to exercise the right to freedom of expression and information;
  - b) for compliance with a legal obligation which requires processing by the Data Controller pursuant to Union or Member State law to which the Data Controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
  - c) based on a public interest in the field of occupational health or public healthcare;
  - d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right mentioned in paragraph 1 is likely to render impossible or seriously impair this data processing; or
  - e) to bring, enforce or defend legal claims.

## **Restriction**

- 1) The Data Subject shall have the right to obtain from the Data Controller restriction of processing where one of the following applies:
- a) (a) the Data Subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary for the Data Controller to verify the accuracy of the personal data; (b) the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead that its use be restricted;
  - b) The Data Controller no longer needs the personal data for the purposes of data processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or



- c) The Data Subject has objected to the data processing for a reason related to their own situation; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Data Controller override those of the Data Subject.
- 2) Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
- 3) A Data Subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the Data Controller before the restriction of processing is lifted.

## **Objection**

The Data Subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation, when:

- a) in the framework of exercising a task under the official authority vested in the Data Controller, or
- b) data processing necessary for the enforcement of the legitimate interests of the Data Controller or a third party is carried out,
- c) including profiling based on the provisions mentioned.

In the above cases, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.

## **Enforcement of the Data Subject's rights**

In the event of access, erasure, correction, restriction, objection, or data portability, the Data Subject may submit their request to the Data Protection Officer.

The Data Subject is entitled to submit a request in writing via electronic mail or on a paper format. The Data Subject shall indicate in their request with respect to which personal data they requests the Data Controller to take measures.

The Data Controller shall examine the request not later than within 1 month after receipt of the request. The Data Controller may extend the deadline for the examination of the request by further 2 months where necessary, taking into account the complexity and number of the requests. The Data Subject shall be informed in advance of the fact and reasons for the extension.

If the Data Subject's request is well-founded, the Data Controller shall perform the requested measure within the deadline for procedure, and shall inform the Data Subject thereof in writing. If the Data Controller rejects the Data Subject's request, it shall issue a written decision to that effect. In its decision, it shall indicate the facts on which the decision is based, the reasons for

its decision, with reference to the relevant legislation or case law, and shall inform the Data Subject of the legal remedies available against the decision of the Data Controller.

The Data Subject may only be required to pay the costs associated with exercising their rights if the Data Controller has informed the Data Subject in writing within 8 days of receiving the request that the request is excessive and, at the same time, has informed them of the amount of the administrative costs, but the Data Subject nevertheless maintains their request in writing. The request shall be deemed to be maintained if, despite the information provided by the Employer, the Data Subject fails to withdraw their request within 5 working days or by the end of the administrative deadline.

The Data Subject obliged bear the costs shall pay the costs separately within 8 days of receipt of the payment request issued by the Data Controller.

If the Data Subject disagrees with the decision of the Data Controller, or if the Data Controller fails to meet the relevant procedural deadline specified above, the Data Subject may exercise the remedies available under clause 7.

## **11. Exercise of the Data Subject's rights**

In order to exercise the above rights, the Data Subject may submit a request to the Data Controller, which shall be fulfilled without undue delay, but within one month of receipt at the latest. This deadline may be extended by two months, taking into account the complexity of the request and the number of requests.

## **12. Right to remedy**

In the event of unlawful data processing, the Data Subject may lodge a complaint with the Supervisory Authority or initiate civil proceedings against the Data Controller. The lawsuit can be filed at the Budapest-Capital Regional Court according to the Data Controller's registered office or, in the discretion of the Data Subject, at the regional court having jurisdiction according to their domicile or place of residence.

Name of the Supervisory Authority: National Authority for Data Protection and Freedom of Information

(NAIH)

Registered seat: H-1055 Budapest, Falk Miksa utca 9-11.

Mailing address: H-1363 Budapest Pf. 9.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

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

Website: <http://naih.hu>

The Data Subject may also enforce their rights in court, in which case the proceedings shall be conducted by the regional court, and the court with jurisdiction shall be the Budapest-Capital Regional Court. The action may also be brought before the regional court of the Data Subject's

domicile or place of residence (the contact details of the regional courts can be found at the following link: <http://birosag.hu/torvenyszekek>).

The Data Subject also has the right to entrust a non-profit organization or association with submitting the complaint on behalf of the Data Subject, conduct court proceedings and, where permitted by law, enforce their right to compensation on their behalf, which has been established in accordance with Hungarian law and whose statutory objectives are to serve the public interest and to protect the rights and freedoms of Data Subjects with regard to their personal data.

Before lodging a complaint with the supervisory authority or the court, we request you to contact the Data Controller in order to discuss and resolve the issue as soon as possible ([dpo@defenseinnovation.hu](mailto:dpo@defenseinnovation.hu)).

### **Amendment of the Privacy Notice**

The Data Controller reserves the right to amend this Privacy Notice any time, and it shall inform the data subjects in an appropriate manner. Information regarding data processing are disclosed at the [www.defenseinnovation.hu](http://www.defenseinnovation.hu) website.

Budapest, 05 August 2025.