

PRIVACY AND DATA MANAGEMENT NOTICE

(Data Processing Related to Communication)

I. INTRODUCTION OF THE DATA CONTROLLER

HUNGARORING Sport Zrt. (hereinafter: “**Data Controller**” or “**Company**”) considers the protection of the informational self-determination rights of its employees, partners, clients and visitors to be of utmost importance. The Data Controller treats personal data confidentially in accordance with the applicable European Union and Hungarian legislation, as well as relevant data protection authority practices, and takes all security and organizational measures necessary to ensure the security, confidentiality, integrity and availability of the data.

Taking into account the provisions of:

- **Regulation (EU) 2016/679 of the European Parliament and of the Council** of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (**GDPR**), and
- **Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.)**,

the Data Controller publishes the following **Privacy Notice** (hereinafter: “**Notice**”) in order to protect personal data provided by individuals contacting the Data Controller when using the communication interfaces provided in connection with its activities, in particular the operation and utilization of the **HUNGARORING Race Track** (hereinafter: “**Race Track**”) and the events held there.

This Notice is effective **from 6 March 2026 until revoked** regarding the processing of personal data provided by individuals using the communication channels operated by the Data Controller.

The Data Controller reserves the right to unilaterally modify this Notice at any time. If the Notice is amended, the Data Controller will inform the affected persons accordingly.

Data Controller details

Company name: **HUNGARORING Sport Zártkörűen Működő Részvénytársaság**
Short name: **HUNGARORING Sport Zrt.**

Company registration number: **13-10-040464**



Registered seat:
2146 Mogyoród, Hungaroring út 10., Hungary

Postal address:
2146 Mogyoród, P.O. Box 10

Email:
office@hungaroring.hu

Website:
<https://hungaroring.hu/>

Legal representative:
Zsolt István Gyulay, Chairman and CEO

Data Protection Officer:
Dr. István Fekete

DPO contact:
gdpr@hungaroring.hu

The Data Controller processes personal data in compliance with all applicable laws, particularly:

- **Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Infotv.)**
- **Regulation (EU) 2016/679 (GDPR)**

The Data Controller treats personal data confidentially and implements all technical and organizational measures necessary for secure data storage and processing.

Definitions

The terminology used in this Notice corresponds to the definitions set out in **Article 4 of the GDPR**, supplemented where necessary by **Section 3 of Infotv.** Relevant definitions are listed in **Annex 1.**

Whenever this Notice refers to “data” or “data processing”, it refers to **personal data and their processing.**

II. PURPOSE OF DATA PROCESSING

In today's fast-paced world, the Data Controller primarily communicates with visitors, partners and customers electronically, although it is also possible to contact the Company by mail.

Anyone may contact the Data Controller:

- by email (e.g. **office@hungaroring.hu**, **sales@hungaroring.hu**)
- for **requests for quotations, information requests, technical questions or other matters**, or
- **by postal mail.**

Additionally, within its **sustainability management system**, the Data Controller provides an **online reporting platform** (hereinafter: “**reporting platform**”) for sustainability-related inquiries.

During communication with individuals in relation to any matter, the Data Controller processes emails, letters and submissions received through the reporting platform in accordance with this Notice.

2.1 Purpose of data processing

Communication between the Data Controller and the data subject, including but not limited to:

- receiving sustainability-related inquiries
- sending responses to such inquiries
- responding to requests submitted by interested persons.

The Data Controller processes personal data **solely for the purpose of communication with the individual and handling the matter described in the message.**

Individuals may contact the Data Controller by postal or electronic means in any matter.

The Data Controller initiates contact only:

- in connection with the performance of an existing contract, or
- based on another lawful legal basis,

while respecting applicable data protection regulations.

2.2 Legal basis for processing

The legal basis for processing personal data is:

Article 6(1)(b) GDPR

Processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract.

The Data Controller considers communication with individuals as:

- processing necessary prior to concluding a contract, or
- processing related to an existing contract.

Additionally, **Article 6(1)(f) GDPR (legitimate interest)** also serves as a legal basis.

The Data Controller has a legitimate interest in processing the personal data necessary to respond to inquiries addressed to it.

2.3 Personal data processed

The following personal data may be processed:

- Name
- Email address
- Postal address (in case of postal correspondence)
- Any additional information provided by the data subject that is relevant to the inquiry.

For the **reporting platform**:

- Name
 - Email address
 - Telephone number
 - Any other information considered relevant by the data subject.
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2.4 Categories of data subjects

Any person who:

- contacts the Data Controller through its communication channels, or

- submits a report via the reporting platform and acknowledges the applicable privacy notice.

Also included are:

- persons in a contractual relationship with the Data Controller, and
- their designated contact persons.

2.5 Source of personal data

The **data subject**.

Since the personal data originate from the data subject, the Data Controller informs the individual about the scope of processed data at the time they are collected.

2.6 Recipients of personal data

Personal data are primarily accessible to the **Data Controller**.

Only those employees of the Data Controller may process personal data:

- whose job responsibilities include handling the data listed in section 2.3, and
- who are responsible for managing communication inquiries or the related administrative tasks.

Data processors

Data processors acting on behalf of the Data Controller may process personal data only:

- for the purposes defined by the Data Controller,
- according to contractual instructions,
- without independent decision-making authority.

They are bound by **confidentiality obligations and contractual guarantees** regarding the protection of personal data.

Data processors:

Invitech Zrt.

Registered seat: 2040 Budaörs, Edison utca 4.

Role: Email system hosting provider

CSAO Kft.

Registered seat: 3346 Bélapátfalva, Marx K. u. 20.

Role: Server operator ensuring operation of the email system

2.7 Transfer of data to third countries or international organizations

Beyond the data processors listed above, the Data Controller does **not transfer personal data to other parties**, except:

- upon request from competent authorities, or
- if necessary for enforcing legal claims.

If legal evaluation of damages or liability issues becomes necessary in relation to the services provided, personal data may be transferred to the Data Controller's **legal advisor** based on **Article 6(1)(f) GDPR (legitimate interest)** for the purpose of investigating complaints and enforcing legal rights.

2.8 Duration of data processing

If a **contract is concluded** between the Data Controller and the data subject, personal data obtained during communication will be processed in connection with that contract in accordance with the relevant privacy notice.

If **no contract is concluded**, and the communication has no legal effect in the future, personal data will be processed **until the communication is definitively concluded**.

2.9 Automated decision-making and profiling

The Data Controller **does not carry out automated decision-making** and **does not create profiles** of data subjects based on the available personal data.

2.10 Method of data processing

Personal data are processed:

- **electronically**, and
- **manually (paper-based)**.

2.11 Provision of personal data

Providing personal data is a **condition for responding to messages** and thus for communication between the data subject and the Data Controller.

Providing such data is **voluntary**.

III. DATA SECURITY

The Data Controller ensures that personal data may be accessed only by persons whose responsibilities require such access.

Data transfers are performed in a **secure and audited manner**, with the knowledge of the data subject, avoiding unnecessary data duplication.

The Data Controller:

- maintains records of all processing activities
- performs **risk assessments** to identify potential risks and data protection incidents.

Based on these assessments, the Data Controller implements **technical and organizational measures** including:

- pseudonymization and encryption of personal data
- ensuring the confidentiality, integrity, availability and resilience of processing systems
- restoring availability and access to data in case of incidents
- regularly testing and evaluating security measures.

The Data Controller protects its internal network with **multi-layer firewall protection** and stores data **redundantly in multiple locations** to prevent loss.

The internal network is protected by **multi-layer malware protection systems**, including antivirus technologies.

The Data Controller makes every reasonable effort to ensure that its IT systems and software comply with widely accepted technological standards.

IV. RIGHTS OF THE DATA SUBJECT

The Data Controller is committed to ensuring **lawfulness, fairness and transparency** in data processing.

The data subject may exercise the rights provided by the GDPR at any time.

These include:

- Right to information
- Right to withdraw consent
- Right of access
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to object
- Right to data portability

(The detailed legal explanations from the Hungarian text remain applicable and correspond to Articles 12–22 of the GDPR.)

V. PROCEDURE FOR EXERCISING DATA SUBJECT RIGHTS

The data subject may exercise their rights:

- by email: **gdpr@hungaroring.hu**
- by postal letter sent to the registered office of the Data Controller

- in person at the registered office.

The Data Controller will respond to requests **within 30 days**.

After the death of the data subject, certain rights may be exercised **within 5 years** by an authorized person or close relative in accordance with Hungarian law.

VI. LEGAL REMEDIES

The data subject may initiate **court proceedings** if they believe their personal data are processed unlawfully.

Proceedings may be brought before the competent **regional court**, including the **Budapest Regional Court**.

Additionally, complaints may be submitted to:

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

Address:

1055 Budapest, Falk Miksa utca 9-11

Postal address:

1363 Budapest, P.O. Box 9

Phone: +36 (1) 391 1400

Email:

ugyfelszolgalat@naih.hu

Website:

<http://naih.hu>

The Data Controller is committed to lawful and transparent processing and recommends contacting its **Data Protection Officer** first to resolve any concerns.

The Data Controller shall not be liable for consequences arising from **incorrect personal data provided by the data subject**.



Mogyoród, 6 March 2026

HUNGARORING Sport Zrt.

Represented by:

Zsolt István Gyulay

Chairman and CEO

Annex 1

Definitions related to the processing of personal data

- **Data controller:** the legal entity that determines the purposes and means of the processing of personal data.
- **Data processing:** any operation or set of operations performed on personal data or data sets, whether by automated or non-automated means, such as collection, recording, organization, structuring, storage, transformation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Data transfer:** making data accessible to a specified third party.
- **Data erasure:** rendering data unrecognizable in such a way that their restoration is no longer possible.
- **Data marking:** the assignment of an identifying mark to data for the purpose of distinguishing them.
- **Restriction of data processing:** the marking of stored personal data with the aim of limiting their processing in the future.
- **Data destruction:** the complete physical destruction of the data carrier containing the data.
- **Data processor:** the legal entity that processes personal data on behalf of the data controller.
- **Recipient:** a natural or legal person, public authority, agency, or any other body to whom or which personal data are disclosed, regardless of whether they are a third party.
- **Data subject:** an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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.
- **Third party:** a natural or legal person, public authority, agency, or any other body other than the data subject, the data controller, the data processor, or persons who, under the direct authority of the controller or processor, are authorized to process personal data.
- **Consent of the data subject:** any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which the data subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them.
- **Personal data:** any information relating to the data subject.
- **Objection:** a statement made by the data subject objecting to the processing of their personal data and requesting the termination of the processing and/or the deletion of the processed data.