

# PRIVACY POLICY

## Regarding the application of security camera system

Debrecen Sports Center provides the following information to the persons entering the monitored area (hereinafter: Data Subjects) based on Article 13 of the EU's General Data Protection Regulation (GDPR) regarding the data processing related to the camera surveillance systems operating in the area of the facilities operated by the Data Controller:

### 1. Data Controller's name and contact details

Name: Debrecen Sports Center Nonprofit Public Benefit Ltd.  
(Debreceni Sportcentrum Közhasznú Nonprofit Kft.)  
(hereinafter: Sportcentrum or DSC)

Address: 5 Oláh Gábor Street, Debrecen, H-4032

Phone number: +36 52 514 400

Mailing address: 5 Oláh Gábor Street, Debrecen, H-4032

E-mail address: [info@debrecenisportcentrum.hu](mailto:info@debrecenisportcentrum.hu)

Website: [https://www.debrecenisportcentrum.hu/index\\_en.php](https://www.debrecenisportcentrum.hu/index_en.php)

### 2. The purposes and legal basis of processing and categories of personal data concerned

The Data Controller manages the personal data of the Data Subjects in order to protect its own assets and interests and of the visitors to its facilities, to guarantee personal safety, and to meet the information security requirements related to the Data Controller's activities.

Data being processed: *video recordings of the data subjects (recorded and live image)*

In the case of license plate scanning systems, the *license plate number* of the vehicle used by the person concerned.

Location and angle of view of cameras:

- Főnix Aréna (4028 Debrecen, Kassai road 28.)

The angle of view of the cameras *in external spaces* extends to the external, closed parking lots belonging to the hall (north and south parking lots), to the "totem pole" - owned by the Sports Center - located in front of the hall's entrance and to the entrance points of the facility. License plate scanning cameras work in the parking lots closed with a barrier.

*The cameras placed inside the facility* monitor the cloakrooms, the catering units handling money, the traffic corridors, the viewing area, as well as the high-security rooms that operate the facility (engine rooms, control room, server room, etc.).

- Debreceni Jégcsarnok (4031 Debrecen, Derék street 33.)

The *angle of view of the cameras* extends to the private parking lots belonging to the hall and to the entrance points of the facility.

*Cameras located inside the facility* monitor the entrances, the viewing area, the ticket office, as well as rooms and corridors closed to the public.

- Debrecen Sports Pool (4032 Debrecen, Oláh Gábor street 5.)

The *angle of view of the cameras* extends to the private parking area belonging to the swimming pool and to the entrance points of the facility.

*Cameras placed inside the facility* monitor the entrances, the reception and its surroundings, the moving corridors, spaces, and the entrance to the changing rooms, as well as the luggage lockers.

In the changing room available to the public of the Debrecen Sports Pool, the luggage lockers are monitored by cameras to prevent theft.

- Sports Complex at Oláh Gábor Street and Debrecen Sport Hotel (4032 Debrecen, Oláh Gábor street 5.)

The *viewing angle of the cameras* extends to the entrance points of the buildings in the Sports Complex area (Corpus Fitness entrance, entrance to the main building next to the athletics field), the sports fields and the fitness park. License plate scanning cameras operate at entry points closed by barriers.

A camera surveillance system operates on the ground floor of the *Sporthotel*, with a view of the reception and its forecourt.

- Józsa Grund (4225 Debrecen-Józsa, Gönczy Pál street 101.)

The angle of view of the cameras covers the entrance and the area of the sports fields.

The cameras do not see the interior of the changing rooms, offices and toilets, as well as the changing cabins in the Debrecen Sports Pool.

The legal basis for data processing is the legitimate interest of the Data Controller according to Article 6 (1) point f) of the GDPR. It is the legitimate interest of the Debrecen Sports Center to be able to guarantee the appropriate level of security – with the large number of visitors and the large area of the sport venues – for its own assets, the guests visiting the facilities, the employees, the property of the participants of the events organized in these facilities, also the security of the electronic information systems managed by the Data Controller and located in these facilities.

### **3. Period for which the personal data will be stored**

Recordings are kept for 7 days.

In the event of a successful protest by the data subject, the Data Controller will delete the personal data.

#### **4. Transfer of the data and security measures**

The manager of the Debrecen Sports Center is authorized to make decisions about the recordings.

In case of official or judicial proceedings, the Data Controller may forward the recordings to the requesting or acting authorities.

The Data Controller ensures the security and legal use of the data by taking appropriate technical and organizational measures. The Data Controller created a Camera Operation Policy, which provides for the conditions of data processing, technical requirements and related procedures.

As a data processor on behalf of the Debrecen Sports Center, the staff member of the contracted security service (GEWISS GUARD Kft.) can view the live video image.

Except in the cases indicated above, the data will not be forwarded to third parties.

#### **5. Rights of the data subject**

The Data Subject can submit his/her request in any way (in writing, electronically or even orally) to the contact details of the Data Controller listed above.

The Data Controller will inform the Data Subject of the decision made following the request without undue delay, but within one month at the latest - which can be extended by another two months if necessary.

##### **5.1 Right of access by the data subject**

The Data Subject is entitled to receive feedback from the Data Controller as to whether his/her personal data is being processed, and if so, he/she is entitled to access the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed;
- d) the envisaged period for which the personal data will be stored;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) the source of the personal data;
- h) the existence of automated decision-making.

Based on Article 15 (3) of the GDPR, the data subject is entitled to request a copy of the data relating to him free of charge, in accordance with the procedure contained in Article 12.

##### **5.2 Right to rectification**

The Data Subject may request the correction or completion of his personal data processed by the Data Controller.

### 5.3 Right to erasure

The Data Subject may request the deletion of his/her personal data processed by the Data Controller if one of the following reasons exists:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or the data subject withdraws consent on which the processing is based
- b) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2)
- c) the personal data have been unlawfully processed;
- d) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

### 5.4 Right to restriction of processing

At the request of the Data Subject, the Data Controller restricts data processing if one of the following conditions is met:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the 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;
- d) the data subject has objected to processing on public interest or legitimate interest, in this case, the restriction applies to the period until it is established whether the legitimate grounds of the controller override those of the data subject.

If the processing is subject to restrictions based on the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent 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 reasons of important public interest of the Union or of a Member State.

### 5.5 Right to object

The Data Subject may object to the processing of his/her personal data if the processing of personal data is necessary solely for the enforcement of the legitimate interests of the Data Controller or a third party.

## 5.6 Right to data portability

Due to the legal basis of data management, the data subject cannot exercise this right. In this regard, see Article 20 of the GDPR.

## 6. Right to complain and legal remedy

The Data Subject may file a complaint regarding the data management directly with the Hungarian National Data Protection and Freedom of Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH).

Address: 1055 Budapest, Falk Miksa street 9-11.

Mailing address: 1363 Budapest, P.O.B 9.

Phone number: +36-1-391-1400

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

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

In the event of a violation of your (the Data Subject) rights, you may go to court. Adjudication of the lawsuit falls within the jurisdiction of the Regional Court. At the choice of the data subject, the lawsuit can also be initiated before the Regional Court of the data subject's place of residence or temporary residence in Hungary.

Effective from: xx.xx.2022.