

NOTICE ON DATA PROCESSING

relating to the ELECTRONIC SURVEILLANCE SYSTEM

at Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases
at 8380 Hévíz, Dr. Schulhof Vilmos sétány 1.

The Institution hereby informs you, by way of this NOTICE ON DATA PROCESSING (relating to the electronic surveillance system operating at Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases), that it operates an electronic surveillance system at its registered office located at 8380 Hévíz, Dr. Schulhof Vilmos sétány 1.

1. Name and contact details of the data controller:

Name of the data controller: Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases

Mailing address of the data controller: 8380 Hévíz, Dr. Schulhof Vilmos sétány 1.

E-mail address of the data controller: info@spaheviz.hu

Telephone number of the data controller: +36 83 501 700

Website of the data controller: www.spaheviz.hu

The data processing principles of Hévíz Spa Saint Andrew Hospital for Rheumatic Diseases comply with the applicable legislation on data protection, with special regard to the following:

- 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, and repealing Directive 95/46/EC (General Data Protection Regulation – GDPR)
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Information Act)
- Act V of 2013 on the Civil Code (Civil Code)
- Act CLIV of 1997 on healthcare (Healthcare Act)
- Act XLVII of 1997 on the Processing and Protection of Personal Healthcare Data and Related Personal Data
- Act LIII of 1996 on Nature Conservation
- Act CLV of 1997 on Consumer Protection (Consumer Protection Act)
- Act XIX of 1998 on Criminal Procedure (Criminal Procedure Act)
- Act C of 2000 on accounting (Accounting Act)
- Act CVIII of 2001 on Electronic Commerce Services and Certain Issues related to the Information Society (Electronic Commerce Act)
- Act C of 2003 on Electronic Communication (Electronic Communication Act)
- Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (Security Services Act)
- Act XLVIII of 2008 on Certain Restrictions on Commercial Advertising (Commercial Advertising Act)
- Act CLXIV of 2005 on Commerce

An electronic surveillance and recording system, including

cameras, is operating on the premises operated by Hévíz Spa Saint Andrew Hospital for Rheumatic Diseases. The precise locations of the cameras, and designation of the monitored areas, are included in the annex to this notice.

2. Purpose of the data processing: preventing and detecting illegal acts, and apprehending perpetrators and proving the commitment of illegal acts, in the interest of protecting human life and physical wellbeing and property, identifying people entering the premises of the Institution without authorisation, recording the fact of entry, documenting the activities of unauthorised persons and providing assistance for investigations of the accidents at work and other accidents that may occur.

3. Legal grounds for the data processing:

- for guests, the legal ground is the consent of the data subject, granted by entering the area of the restaurant and using the service road,
- for employees, Section 11 of Act I of 2012 on the Labour code (Labour Code) and Article 6 (1) f) of the GDPR, since the protection of property is a legitimate interest pursued by Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases,
- for patients, the protection of life and physical wellbeing.

4. Type of processed personal data: images and sounds of persons entering the premises of the Institution and people using internal service roads, as captured on image recordings, and their movement within the Institution, as personal data recorded by the surveillance system.

5. Duration of the processing: thirty days unless used [Security Services Act, Section 31 (3)c)].

Data processor:

Name

Registered office

Data processing activity: maintenance of electronic surveillance and recording system, saving of recordings to external media.

6. Use of the recordings

a. Persons entitled to view the live images from the cameras: persons with authorisation working in jobs determined in the Regulations of Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases, and the authorised employees of Bell Telecom.

b. Persons entitled to view the recordings made using the cameras: authorised employees of Hévíz Spa and Saint Andrew's

Hospital for Rheumatic Diseases and Bell Telecom Kft.

Persons entitled to save the recordings made by the cameras onto external media:

authorised employees of MS Technika Kft.

c. Recordings made by the camera surveillance and recording system of Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases may only be viewed by authorised persons for the purpose of proving illegal acts committed against human life, physical wellbeing and property, and for identifying the perpetrators of such acts.

7. Types of processed personal data: images of persons entering the area of the Institution and people using service roads, as captured on image recordings, and other personal data recorded by the surveillance system.

8. Duration of the processing: thirty days unless used [Security Services Act, Section 31 (3) c)].

Data processor:

Name

Registered office:

Data processing activity: maintenance of electronic surveillance and recording system, saving of recordings to external media.

9. Use of the recordings

Persons entitled to view live images from the cameras: authorised employees of Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases and Bell Telecom Kft. Persons entitled to view the recordings made using the cameras: authorised employees of Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases and Bell Telecom Kft. Persons entitled to save the recordings made by the cameras onto external media: authorised employees of Bell Telecom Kft.

Recordings made by the camera surveillance and recording system of Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases may only be viewed by authorised persons for the purpose of proving illegal acts committed against human life, physical wellbeing and property, and for identifying the perpetrators of such acts.

10. Data subjects whose rights or legitimate interests are affected by the recording of images may, providing evidence of his or her rights or legitimate interests, ask the data controller to refrain from destroying or erasing the recording until contacted by a court or authority, but for maximum of 30 days. A person featuring in the recording may request information regarding the recording made by the surveillance system, and may ask for a copy to be made, or if another person also features in the recording, he or she may view the recording. The data subject may request the erasure of the recording made of him or her, or the rectification of data related to the recording, or may object to the data processing.

The data controller makes a record of all viewings of the recordings, in which the name of the person performing the viewing, the reason for accessing the data, and the time of such access, are recorded.

11. Data transfer: to authorities

and courts conducting infringement or criminal proceedings.

Transferred data: recordings made by the surveillance system and containing relevant information.

Legal grounds for the data transfer: Sections 71 (1), 151 (2) a) and 171 (2) of the Criminal Procedure Act, as well as the Sections 75 (1) a) and 78 (3) of the Accounting Act.

12. Duration of the data processing:

Through its internal data protection officer, in order to be able to check measures taken in relation to a personal data breach and to provide information for the data subject, Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases keeps records of the range of personal data affected, the range of data subjects affected by the data protection incident and the number of such data subjects, the date, circumstances and impacts of the data protection incident, the measures taken to eliminate it, and other data specified in the law prescribing the data processing.

Pursuant to the Information Act, for the purpose of verifying the legitimacy of data transmission and informing the data subjects, the data controller maintains a record of data transfers, which contains the date of transfer of data processed by it, the legal grounds for such transfer and the recipient, specification of the transferred data, and other details specified in the law prescribing the data processing. These data are kept by the data controller in accordance with Section 15 (3) of the Information act for a period of 5 years

At the data subject's request, the data controller provides information regarding the data subject's data processed by it or processed by the data processor engaged by it or on its instructions, the source of such data, the purpose, legal grounds and duration of data processing, the name and address of the data processor and its activity related to the data processing, the circumstances and effects of the personal data breach, and the action taken to rectify it, and – if the personal data of the data subject is transferred – the legal grounds and recipient of, such data transfer.

The duration of the obligation regarding the keeping of data affected by the data transfer or personal data breach – and based on this, the obligation to provide information – may be limited under the law prescribing the data processing. The minimum period that may determined in the context of such limitation is five years in the case of personal data and twenty years in the case of special data.

13. Data security measures

Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases declares that appropriate security measures have been taken to protect the personal data, contained in the recordings of cameras, from unauthorised access, modification, transmission, public disclosure, erasure or destruction, as well as from accidental destruction and inaccessibility caused by changes in the technology used. Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases ensures that employees who have access to data have received the appropriate information and training regarding the data protection requirements.

14. Please be informed that Hévíz Spa and Saint Andrew's Hospital for Rheumatic Diseases does not operate an electronic access control system requiring personal identification.

Hévíz, 18 May 2018