

Information on data processing relating to the services provided by the Visegrad Patent Institute and to the personal data of the visitors of its website

The Visegrad Patent Institute (hereinafter 'the VPI') has been established as an intergovernmental organization for cooperation in the field of patents by the four Visegrad countries: the Czech Republic, Hungary, the Republic of Poland and the Slovak Republic. The VPI started its operation on 1 July 2016.

The VPI qualifies as an International Searching Authority (ISA) and International Preliminary Examining Authority (IPEA) under the Patent Cooperation Treaty (PCT), therefore it conducts international searches, international preliminary examinations and supplementary international searches.

As an international organization the VPI is committed to complying with the laws, to following the best international practices and to ensuring the transparency of its operation. Consequently, it drew up and published on its website the information pursuant to Articles 13 to 14 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, and repealing Directive 95/46/EC (General Data Protection Regulation).

I. General information

The controller of the personal data is the Visegrad Patent Institute (seat: Hungary, 1081 Budapest, II. János Pál pápa tér 7., website: <http://vpi.int/index.php/hu/>, phone number: +36 1 613 5130, e-mail address: secretariat@vpi.int).

The VPI is committed to the adequate protection of personal data, therefore it implements technical and organizational measures, as required by the state of the technology, in order to ensure appropriate data security.

Any data subject has the right to request from the VPI access to personal data concerning him or her, the rectification, erasure or restriction of the processing of personal data concerning him or her or object to such processing, furthermore, in the cases provided for in the GDPR, he or she may exercise the right to data portability.

If any data subject considers that his or her rights have been infringed as a result of data processing by the VPI, he or she may contact the VPI and the competent supervisory authority to request information and to have his or her complaint examined.

Detailed information on the rights of data subjects can be found under point III.

II. Information relating to the different categories of processing

| 1. International search | |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | for the applicant: name, address, nationality, residence, signature for the inventor and his or her representative: name and address |
| the purposes of the processing of personal data | consideration of international applications, conducting of international searches, forwarding international search reports to the International Bureau of the World Intellectual Property Organization, and, where necessary, giving information or handling complaints |
| legal grounds for the processing of personal data | Article 6(1)(c) of the GDPR [processing is necessary for compliance with a legal obligation to which the controller is subject] PCT Article 4(1)(iii) and (v), Article 11(i) and (v)(c) PCT IR Rule 4(4) to (8) and (15) |
| the recipients or categories of recipients of personal data (if any) | the VPI transfers the files containing the personal data to the national authority designated in the application |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | the VPI receives the personal data from the International Bureau of the World Intellectual Property Organization, and, after having carried out the search, it sends back the results to the International Bureau no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the files of international searches for a period of 10 years from the last day of the of the year of the international application |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | the applicant or his or her representative provides the relevant personal data for the World Intellectual Property Organization |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 2. International search | |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | phone number, fax number, e-mail address |
| the purposes of the processing of personal data | faster communication in the course of considering international applications, conducting international searches, giving information or handling complaints |
| legal grounds for the processing of personal data | Article 6(1)(c) of the GDPR [processing is necessary for compliance with a legal obligation to which the controller is subject] PCT Article 4(1)(iii) and (v), Article 11(i) and (v)(c) PCT IR Rule 4(4) to (8) and (15) |
| the recipients or categories of recipients of personal data (if any) | the VPI transfers the files containing the personal data to the national authority designated in the application |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | the VPI receives the personal data from the International Bureau of the World Intellectual Property Organization, and, after having carried out the search, it sends back the results to the International Bureau no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the files of international searches for a period of 10 years from the last day of the of the year of the international application |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | the applicant or his or her representative provides the relevant personal data for the World Intellectual Property Organization |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 3. International search | |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | name of the applicant, signature of the applicant or of his or her representative and one of the categories of data below <ul style="list-style-type: none"> - bank account number, name of the holder of the bank account, name of the bank where the account is maintained, or - name and address for service |
| the purposes of the processing of personal data | partial reimbursement of the international search fee |
| legal grounds for the processing of personal data | Article 6(1)(c) of the GDPR [processing is necessary for compliance with a legal obligation to which the controller is subject] PCT IR Rule 16(3) and Rule 41(1) |
| the recipients or categories of recipients of personal data (if any) | accountant |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | there is no such transfer of data |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the files of international searches for a period of 10 years from the last day of the of the year of the international application |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | the applicant or his or her representative provides the relevant personal data for the World Intellectual Property Organization |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 4. International preliminary examination | |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | for the applicant: name, address, nationality, residence, signature for the inventor and his or her representative: name and address |
| the purposes of the processing of personal data | consideration of requests for international preliminary examination, conducting of international preliminary examinations, forwarding international preliminary examination reports to the International Bureau of the World Intellectual Property Organization, and, where necessary, giving information or handling complaints |
| legal grounds for the processing of personal data | Article 6(1)(c) of the GDPR [processing is necessary for compliance with a legal obligation to which the controller is subject] PCT Article 31, Article 4(1)(iii) and (v), Article 11(i) and (iii)(c) PCT IR Rule 53, Rule 4(1)(a)(iii), Rule 4(4) to (8) and (15) |
| the recipients or categories of recipients of personal data (if any) | the VPI transfers the files containing the personal data to the national authority designated in the application |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | the VPI receives the personal data from the International Bureau of the World Intellectual Property Organization, and, after having carried out the search, it sends back the results to the International Bureau no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the files of international preliminary examinations for a period of 10 years from the last day of the of the year of the international application |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | the applicant or his or her representative provides the relevant personal data for the World Intellectual Property Organization |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 5. International preliminary examination | |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | phone number, fax number, e-mail address |
| the purposes of the processing of personal data | faster communication in the course of considering requests for international preliminary examination, conducting international preliminary examinations, giving information or handling complaints |
| legal grounds for the processing of personal data | Article 6(1)(c) of the GDPR [processing is necessary for compliance with a legal obligation to which the controller is subject] PCT Article 31, Article 4(1)(iii) and (v), Article 11(i) and (iii)(c) PCT IR Rule 53, Rule 4(1)(a)(iii), Rule 4(4) to (8) and (15) |
| the recipients or categories of recipients of personal data (if any) | the VPI transfers the files containing the personal data to the national authority designated in the application |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | the VPI receives the personal data from the International Bureau of the World Intellectual Property Organization, and, after having carried out the search, it sends back the results to the International Bureau no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the files of international preliminary examinations for a period of 10 years from the last day of the of the year of the international application |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | the applicant or his or her representative provides the relevant personal data for the World Intellectual Property Organization |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 6. Supplementary international search | |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | for the applicant: name, address, nationality, residence and signature for the inventor and his or her representative: name and address |
| the purposes of the processing of personal data | consideration of requests for supplementary international search, conducting of supplementary international searches, forwarding supplementary international search reports to the International Bureau of the World Intellectual Property Organization, and, where necessary, giving information or handling complaints |
| legal grounds for the processing of personal data | Article 6(1)(c) of the GDPR [processing is necessary for compliance with a legal obligation to which the controller is subject] PCT IR Rule 45 <i>bis</i> , Rule 4(1)(a)(iii), Rule 4(4) to (8) and (15) |
| the recipients or categories of recipients of personal data (if any) | the VPI transfers the files containing the personal data to the national authority designated in the application |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | the VPI receives the personal data from the International Bureau of the World Intellectual Property Organization, and, after having carried out the search, it sends back the results to the International Bureau no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the files of supplementary international searches for a period of 10 years from the last day of the of the year of the international application |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | the applicant or his or her representative provides the relevant personal data for the World Intellectual Property Organization |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 7. Supplementary international search | |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | phone number, fax number, e-mail address |
| the purposes of the processing of personal data | faster communication in the course of considering requests for supplementary international search, conducting supplementary international searches, giving information or handling complaints |
| legal grounds for the processing of personal data | Article 6(1)(c) of the GDPR [processing is necessary for compliance with a legal obligation to which the controller is subject] PCT IR Rule 45 <i>bis</i> , Rule 4(1)(a)(iii), Rule 4(4) to (8) and (15) |
| the recipients or categories of recipients of personal data (if any) | the VPI transfers the files containing the personal data to the national authority designated in the application |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | the VPI receives the personal data from the International Bureau of the World Intellectual Property Organization, and, after having carried out the search, it sends back the results to the International Bureau no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the files of supplementary international searches for a period of 10 years from the last day of the of the year of the international application |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | the applicant or his or her representative provides the relevant personal data for the World Intellectual Property Organization |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 8. Handling of complaints | |
|--------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | personal data provided by the complainant, in particular: name, address, phone number, fax number, e-mail address |
| the purposes of the processing of personal data | the correction of possible mistakes occurring in the course of the proceedings and improving quality |
| legal grounds for the processing of personal data | Article 6(1)(f) of the GDPR [processing is necessary for the purposes of the legitimate interests pursued by the controller] |
| the recipients or categories of recipients of personal data (if any) | the VPI transfers the files containing the personal data to the national authority designated in the application |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | in the case of complaints relating to international applications, the VPI keeps the files for 10 years from the last day of the year of the international application, and for 5 years in other cases |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | ensuring quality, correction of mistakes, possibility to remedy possible damage to interests |
| the source from which the personal data originate | the complainant or his or her representative provides the relevant personal data for the World Intellectual Property Organization, the VPI or the national intellectual property authority |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 9. Data related to contracts | |
|--------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | for contracting parties being individual persons: name, seat, tax number, bank account number and signature for contracting parties not being individual persons: name and signature of the representative |
| the purposes of the processing of personal data | ensuring the necessary personal data for the VPI to comply with its contractual obligations |
| legal grounds for the processing of personal data | in the case of a contract concluded with a private person: GDPR 6(1)(b) [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] in the case of a contract concluded with a non-private person: GDPR 6(1)(f) [processing is necessary for the purposes of the legitimate interests pursued by the controller] |
| the recipients or categories of recipients of personal data (if any) | where necessary, and only to the extent it is necessary, those performing banking and accounting tasks, as well as the involved employees of MadeIT.hu Informatika Kereskedelmi és Szolgáltató Kft., acting as processor |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the personal data for a period of 5 years from the last day of the year of termination of the contract |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | ensuring the necessary data for complying with contractual obligations |
| the source from which the personal data originate | the other party to the contract |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 10. Contact details related to contracts | |
|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | contact details in contracts (name and contact data: phone number, e-mail address) |
| the purposes of the processing of personal data | personal data necessary for complying with the contractual obligations of the VPI |
| legal grounds for the processing of personal data | GDPR 6(1)(f) [processing is necessary for the purposes of the legitimate interests pursued by the controller] |
| the recipients or categories of recipients of personal data (if any) | where necessary, and only to the extent it is necessary, those performing banking and accounting tasks, as well as the involved employees of MadeIT.hu Informatika Kereskedelmi és Szolgáltató Kft., acting as processor |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the personal data for a period of 5 years from the last day of the year of termination of the contract |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | ensuring the data necessary for complying with contractual obligations and/or for contact purposes |
| the source from which the personal data originate | the other party to the contract |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 11. Data processing related to the website of the VPI | |
|--------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | technical data qualifying as personal data and relating to the type of the browsing programme, to the Internet Protocol address (IP address and port number), to the domain name (URL) and to the date of the visit and the list of visited pages (logging data) automatically generated in order to establish and maintain the Internet connection |
| the purposes of the processing of personal data | the making of statistics |
| legal grounds for the processing of personal data | GDPR 6(1)(f) [processing is necessary for the purposes of the legitimate interests pursued by the controller] |
| the recipients or categories of recipients of personal data (if any) | no personal data are transferred but they may be accessed, to the extent necessary for their work, by the employees of Industrial Property Office of the Czech Republic, acting as processor |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the data for a period of 1 year from their being generated |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | analysis of changes in visit data and of user behaviour, optimisation of the structure of the website, making the website user-friendly |
| the source from which the personal data originate | data subject visiting the website |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 12. Data processing related to the website of the VPI | |
|--------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | any personal data given in user satisfaction surveys, as well as the logging data generated in order to establish and maintain the Internet connection and referred to in the previous table |
| the purposes of the processing of personal data | measuring user satisfaction, making the necessary analyses for the development of a user-friendly website and procedures, and taking any other steps |
| legal grounds for the processing of personal data | GDPR Article 6(1)(a) [the data subject has given consent to the processing of his or her personal data for one or more specific purposes] |
| the recipients or categories of recipients of personal data (if any) | no personal data are transferred but they may be accessed, to the extent necessary for their work, by the employees of Industrial Property Office of the Czech Republic, acting as processor |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the data for a period of 1 year from their being generated but at most until the data subject withdraws his or her consent, if that occurs earlier |
| information relating to the possibility of withdrawing consent | data subjects may at any time withdraw their consent, which, however, does not affect the lawfulness of data processing before such withdrawal |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | data processing is not based on a legitimate interest |
| the source from which the personal data originate | data subjects filling in the satisfaction survey |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

| 13. Data processing related to the website of the VPI | |
|--------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the categories of personal data concerned | technical data qualifying as personal data and relating to the type of the browsing programme, to the Internet Protocol address (IP address and port number), to the domain name (URL) and to the date of the visit and the list of visited pages (logging data) automatically generated in order to establish and maintain the Internet connection |
| the purposes of the processing of personal data | maintaining the information security level of the systems of the VPI, investigating and/or having investigated any possible attacks thereon, and denunciation of the attack |
| legal grounds for the processing of personal data | GDPR 6(1)(f) [processing is necessary for the purposes of the legitimate interests pursued by the controller] |
| the recipients or categories of recipients of personal data (if any) | no personal data are transferred but they may be accessed, to the extent necessary for their work, by the employees of Industrial Property Office of the Czech Republic, acting as processor |
| transfer of personal data to a recipient in a third country or to an international organization and its safeguards | no data are transferred to a third country or to another international organization |
| the period for which the personal data will be stored or the criteria used to determine that period | the VPI keeps the data for a period of 2 years from their being generated |
| if data processing is based on a legitimate interest, the designation of that legitimate interest | maintaining the attained level of integrity, confidentiality and availability of the information systems of the VPI and the data stored therein |
| the source from which the personal data originate | the data subject visiting the website |
| the existence of automated decision-making, including profiling | no automated decision-making, including profiling, is carried out by the VPI |

III. The rights of data subjects and legal remedies

1. Right of access

Everyone has the right to obtain information on his or her personal data processed by the VPI, in particular on

- the purposes of data processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed (including, in the case of recipients in third countries or international organizations, the safeguards of data transfer);
- the period for which the personal data will be stored or the criteria used to determine that period;
- the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning him or her or to object to such processing;
- the right to lodge a complaint with the supervisory authority;
- where the personal data are not collected from him or her, any available information as to their source.

The VPI, upon request, provides to the data subject a copy (including copies of the documents containing such data) of his or her personal data undergoing processing if this does not adversely affect the rights and freedoms of others.

2. Right to rectification

Everyone has the right to obtain, upon request, the rectification of inaccurate personal data concerning him or her, and, taking into account the purposes of the processing, also has the right to have incomplete personal data completed.

3. Right to erasure

The VPI erases the personal data concerning data subjects where

- the personal data are no longer necessary in relation to the purposes for which they were processed by the VPI;
- the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;
- the data subject objects to the processing on grounds relating to his or her particular situation and there are no overriding legitimate grounds for the processing;
- the processing of personal data is unlawful;
- the personal data have to be erased for compliance with a legal obligation to which the VPI is subject;
- the personal data have been collected in relation to the offer of information society services.

The data subject having the right to erasure may initiate erasure by filing a written request with the VPI.

Where the VPI has made public the personal data which are to be erased, it takes the necessary steps pursuant to the provisions of the GDPR to inform the other controllers processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The VPI does not comply with the request for erasure, nor does it inform other controllers of the request for erasure to the extent that processing is necessary

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by law to which the VPI 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 VPI;
- for reasons of public interest in the area of public health, in accordance with the GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or;
- for the establishment, exercise or defence of legal claims.

4. Right to restriction of processing

At the request of the data subject the VPI restricts processing if

- the accuracy of the personal data is contested by the data subject, for a period enabling the VPI to verify the accuracy of the data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the VPI no longer needs the personal data for processing purposes, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the VPI, or it is based on the legitimate interests of the VPI or of a third party, and the data subject has objected to processing, pending verification whether the legitimate grounds of the VPI override those of the data subject.

Where processing has been restricted, the personal data are, with the exception of storage, only 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.

A data subject who has obtained restriction of processing is informed by the VPI before the restriction of processing is lifted.

5. Right to notification regarding rectification or erasure of personal data or restriction of processing

The VPI communicates any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. On request, the VPI informs data subjects about those recipients.

6. Right to data portability

Each data subject has the right to receive the personal data concerning him or her, which he or she has provided to the VPI, in a structured, commonly used and machine-readable format if the processing is based on consent or on a contract to which the data subject is a party and the processing is carried out by automated means, and the exercise of this right does not infringe the right to erasure or affects adversely the rights and freedoms of others.

7. Right to object

Each data subject has the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning him or her, if processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the VPI, or if it is based on the legitimate interests of the VPI or of a third party. In spite of the objection, the VPI has the right to continue processing the personal data if it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, has the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8. The proceedings of the VPI when data subjects exercise their rights

The VPI facilitates the exercise of data subject rights if it can identify the person filing the request or if there is no need for identification. Where the VPI is unable to identify the person filing the request, it may request the provision of additional information necessary to confirm the identity of the data subject.

The VPI provides information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The VPI informs the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

The VPI provides the information in the same manner as it was requested (primarily by post or electronic means), unless otherwise requested by the data subject and the VPI is able to comply with such request.

Where requests from a data subject are manifestly unfounded or excessive, the VPI may charge a fee for the administrative costs in accordance with the law or refuse to act on the request.

If any data subject considers that his or her rights have been infringed as a result of processing by the VPI, in order to request information or to have his or her complaint examined he or she may contact the VPI by post at: *Hungary, 1081 Budapest, II. János Pál pápa tér 7.* or by e-mail at: secretariat@vpi.int; or he or she may lodge a complaint with the competent supervisory authority. The complaint may be lodged with any supervisory authority, but it is best to lodge it in the Member State of the data subject's habitual residence, place of work or place of the alleged infringement. In Hungary the competent supervisory authority is the Hungarian National Authority for Data Protection and Freedom of Information, which can be contacted in person at the following address: Hungary, 1125 Budapest, Szilágyi Erzsébet fasor 22/C., by post at: Hungary, 1530 Budapest, Pf. 5. or by e-mail at: ugyfelszolgalat@naih.hu. See website at: <http://www.naih.hu/index.html>.