

Privacy Notice on the processing of personal data in connection with TANDEM project events

Attendance sheets, participant equality and inclusion data sheets, and photographs, audio and video recordings

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In the project entitled “**TANDEM – Towns and Democracy – Revitalising Local Heritage through Participatory Democracy**”, participation is confirmed by an attendance sheet. Statistical information on equality and inclusion is collected using a separate, voluntary and anonymous data sheet. This notice explains what data we use, for what purposes, for how long, and how you can exercise your rights. It also covers the processing of photographs, audio and video recordings made as part of the project. Only persons aged 18 or over participate in the project; there are no participants who are minors.

1. The controller and its contact details

Controller: **Municipality of Balatonfűzfő**

Registered office and postal address: **8184 Balatonfűzfő, Nike körút 1.**

Electronic contact: polgarmester@balatonfuzfo.hu

Data Protection Officer contact details: **VFK Data Pro. Kft.**

Data Protection Officer contact details: email: info@vfkdatapro.hu.

As project coordinator, the municipality processes the attendance sheets it receives and the project documentation. This notice applies to attendance sheets for both domestic and international participants, including the event in Panagyurishte.

Organisation collecting data on site and its role: Municipality of Balatonfűzfő, 8184 Balatonfűzfő, Nike körút 1., email: polgarmester@balatonfuzfo.hu; data processor, independent role.

If the local organiser acts as an independent controller, it will provide a separate notice on its own data processing.

2. Data processed on the attendance sheet and their purposes

The data subjects are persons participating in project events. We collect the data directly from participants when they complete the attendance sheet. The sheet contains the following: name; town or organisation; country; handwritten signature; sequential number. The data are associated with the identification, location and date of the event, and the domestic or international participant category.

The name and signature serve to confirm actual participation. The town or organisation, country and participant category are necessary to document the composition of participants, international participation and fulfilment of project commitments. The sequential number helps keep the sheet clear and organised. The country field is not a declaration of nationality.

We use the attendance sheet to substantiate activity reports, account for the grant and support checks by authorised bodies. Personal data and signatures are not included in public reports or on the project website.

3. Legal basis for processing attendance sheet data

The legal basis for processing the attendance sheet is Article 6(1)(e) of the GDPR: processing necessary for the performance of the municipality's task in the public interest and fulfilment of its accountability obligations.

The statutory basis for this task is Section 6(a) and Section 13(1), point 7, of Act CLXXXIX of 2011 on Local Governments in Hungary, concerning public participation, local protection of cultural heritage and support for local community cultural activities. The TANDEM project serves to implement these tasks.

Article 20 of the Grant Agreement requires the retention of documents evidencing project implementation. A contractual obligation under the Grant Agreement is not, in itself, equivalent to a legal obligation under Article 6(1)(c) of the GDPR. Signing the attendance sheet confirms participation; it does not constitute consent to data processing.

Participation in the project is voluntary. Attendance sheet data are necessary to confirm participation for project purposes; without them, we cannot reliably document that participation or include it in the project report. This does not, in itself, constitute a general prohibition on attending the event.

4. The participant equality and inclusion data sheet

The data sheet asks about gender (woman, man, non-binary, other), self-identification as a person with a disability (yes or no), and age group (18–29, 30–64, 65 or over). Each question offers a “Prefer not to answer” option. You may also choose not to complete the entire sheet or leave any question unanswered. This does not affect participation or the opportunities available within the project.

The responses are used to assess the composition of participants in aggregate, track equality and inclusion objectives, and monitor and evaluate the project. We do not use responses for individual assessments or discrimination.

Do not write your name, signature, contact details, attendance sheet number or any other identifier on the data sheet. Please submit the sheets to a common collection box, separately from the attendance sheets. We do not record who submitted which sheet, nor do we link the sheets to a participant list or an individual code. In the aggregated results, we combine or omit categories containing so few people that an individual could be recognised.

Responses that are truly anonymous and cannot be linked to an individual even using means reasonably available are not personal data; the GDPR does not apply to them. The absence of a name does not, in itself, ensure anonymity. For an identifiable person, a response about disability may constitute special category data concerning health. In the survey described here, we process only anonymous responses; identifiable responses are not used and are securely erased or destroyed.

After anonymous submission, your individual response cannot be retrieved, corrected or erased because we cannot link it to you. We do not subsequently request an identifier for this purpose. If we plan an inclusion survey that can be linked to individuals, we will not start it without separate prior information and an appropriate legal basis and, for special category data, a condition specified in Article 9 of the GDPR.

5. Retention period

We retain attendance sheets and related documents evidencing implementation for **3 (three) years** from the final payment of the grant. Point 6 of the Grant Agreement Data Sheet specifies this period for grants of up to EUR 60,000; the grant awarded to TANDEM is EUR 50,730. The period is not calculated from the end of the event or the project.

If a check, audit, investigation, court case or procedure to enforce a claim relating to the Grant Agreement is ongoing at the end of the retention period, we retain the relevant documents until that procedure is concluded. We then irreversibly erase or destroy them.

Statistics derived from the anonymous inclusion data sheets that cannot identify individuals are used in the project documentation. Completed anonymous sheets are destroyed after verification of the aggregated results, and no later than the end of the three-year documentation period above. Anonymous aggregated results may remain for longer in professional materials that contain no personal data. The separate section below sets out the different retention rules for photographs, audio and video recordings.

6. Access and data disclosure

Personal data may be accessed only by municipal staff assigned to project implementation, reporting, records management and control tasks, and by authorised contributors, to the extent necessary for their duties.

We may make documents required for grant checks available to the European Education and Culture Executive Agency (EACEA), the European Commission, and the control and investigation bodies authorised under the Grant Agreement, including, within their respective mandates, the European Court of Auditors, OLAF and the European Public Prosecutor's Office. The EU institutions' own data processing is governed by Regulation (EU) 2018/1725 and the relevant institutional privacy notice.

The project partners are: Panagyurishte Municipality (Bulgaria), Gmina Smigiel (Poland), Obec Velky Cetin (Slovakia) and Asociatia Pro Misca (Romania). Partnership alone does not authorise access to all attendance sheets. Personal data may be disclosed only to the extent necessary for a specific implementation or verification task. Only anonymous aggregated results from the inclusion survey are shared with partners and included in reports.

No service provider is currently engaged as a data processor; there is no external data processor.

Transfers of data outside the European Economic Area (EEA) are not relevant to the processing of attendance sheets. The separate section below sets out the rules concerning the online publication of recordings.

7. Processing of photographs audio and video recordings

Photographs, audio and video recordings may be made at project events. The controller for these recordings is also the Municipality of Balatonfűzfő; its contact details appear at the beginning of this notice. This section applies to recordings made and used by the municipality or on its behalf. All project participants are adults, so we do not request parental consent for minors.

Data processed and purposes of processing

A recording may capture your likeness, voice, movements, statement or presentation, and your participation in the event. Related data may include the event's name, location and date. We request separate permission for public appearances identifying you by name or organisation. In connection with recordings, we keep a record of the granting, scope and date of consent, any withdrawal, and the name and declaration needed to evidence these. We do not link recordings to anonymous inclusion data sheets or use them for facial recognition, biometric identification or drawing inferences about special category data.

We may request consent for two separate purposes: (1) making recordings and using them in the project's non-public professional documentation, reporting and evaluation; (2) publicly

publishing selected recordings to present project activities and results. Public use may cover the municipal or project website, project publication and event presentation specified in the consent. Before requesting consent, we specify the particular website, publication, method of use and name of the recipient partner. We do not request general authorisation for social media use or disclosure to the press: such use may take place only with separate consent and prior identification of the specific provider, platform or media outlet.

Legal basis and voluntary consent

The legal basis for making recordings depicting identifiable participants and using them as specified above is consent under Article 6(1)(a) of the GDPR. We request the permission required under personality rights law to make and use images and voice recordings in accordance with Section 2:48 of the Hungarian Civil Code. You may decide separately on each recording type – photograph, audio, video – and on the two purposes of processing; refusing public use does not preclude consent to non-public documentation. Permission for public use can only be understood together with permission to make the recordings needed for that use.

We request consent in advance through a separate, unambiguous declaration and document its granting in a verifiable manner. Entering the event, signing the attendance sheet, reading the notice or remaining silent does not constitute consent. Refusing or withdrawing consent does not affect participation in the event or opportunities within the project. We ensure that participation is possible without being recorded, and organise photography or recording so that persons who refuse it cannot be identified in the recordings. We do not continuously record all participants and do not record private conversations.

The Hungarian Civil Code's exception for crowd images and recordings of public appearances in public life does not, in itself, replace the GDPR legal basis required to process personal data. A group photograph or a photograph taken at an event is not automatically a crowd image. Under this notice, we process recordings of identifiable participants on the basis of consent; if recordings are to be made on a different legal basis, we provide a separate privacy notice in advance. The Grant Agreement's communication requirements do not, in themselves, constitute general authorisation to record and publish participants' likenesses or voices.

Access publication and data disclosure

Non-public recordings may be accessed only by staff assigned to project documentation, communication and control tasks. We share only selected recordings necessary for the authorised purpose with the project partners and grant control bodies named in this notice, within the scope of the relevant consent. Publication by a partner for its own purposes or on its own platform requires separate information and permission identifying that controller and platform. We do not link anonymous inclusion statistics to recordings.

In the case of public publication, website visitors or publication readers may view the recording, and others may copy or share it. Complete recall of printed copies already distributed and complete removal of online copies independently made by others cannot be guaranteed. This does not limit the controller's obligations concerning erasure and the provision of information.

At the time this notice is issued, the controller does not engage any external data processor. If a data processor (e.g. an external photographer or cloud service provider) is engaged in the future to make or store recordings, we will inform data subjects in advance in accordance with Article 13 of the GDPR, providing the service provider's details. A data processor may act under a contract pursuant to Article 28 of the GDPR. When publishing on Facebook, we use

the services of Meta Platforms Ireland Ltd.; as a result, processing the data may also involve international data transfers.

Retention period and data security

We erase raw, unused recordings after selection is completed, and no later than 90 days after the event. Recordings selected with consent for documentation and communication are processed only for as long as necessary for the authorised purpose, and for no more than **3 (three) years** from the final payment of the grant; public publication is also discontinued by that time at the latest. If consent is withdrawn earlier, we proceed as set out in the following paragraphs. This period is an upper limit set by the controller; the obligation to retain project documents does not, in itself, make it mandatory to make or retain recordings of every participant.

Recordings are stored on devices and storage systems protected by access permissions. We transfer them in a controlled and secure manner; unnecessary location data and other technical metadata are removed from public versions. We do not publish attendance sheet signatures or inclusion data sheet responses in recordings either. Erased materials are not restored from backups for active use.

Withdrawal erasure and further rights

You may withdraw your consent at any time, without giving reasons or paying a fee, including by limiting withdrawal to a particular recording type or purpose of use. On site, you may inform the organiser of your decision; afterwards, you may also request withdrawal at polgarmester@balatonfuzfo.hu or by post. We ensure that withdrawing consent is at least as easy as giving it. We request only the information necessary and sufficient for identification, such as the event and the recording concerned. Withdrawal does not affect the lawfulness of prior processing.

After withdrawal, we stop further use based on the consent concerned; we erase the recording without undue delay or make you unrecognisable. We remove publications from our own platforms, do not use the recording in new publications, and notify recipients in accordance with Article 19 of the GDPR, unless this is impossible or involves disproportionate effort. For data made public, we also take reasonable steps under Article 17(2) of the GDPR. After consent is withdrawn, the recording may not be retained solely by reference to the original communication or documentation purpose.

For accountability purposes, under Articles 6(1)(c) and 7(1) of the GDPR, we retain the record evidencing the granting and withdrawal of consent throughout processing and, after it ends, until the end of the three-year documentation period calculated from the final payment of the grant, limiting the data to the minimum necessary. In an ongoing legal dispute, only evidence necessary for the legal claim may be retained until the proceedings are concluded; we provide separate information on the specific legal basis and reasons. This record does not authorise further publication of recordings.

For recordings, you may also exercise the rights of access, rectification, erasure and restriction described in this notice, lodge a complaint and seek a judicial remedy. For data you have provided to us that are processed by automated means on the basis of consent, the right to data portability may also apply under the conditions of Article 20 of the GDPR, without adversely affecting others' rights. We respond to your request within the time limit specified in this notice. The right to data portability cannot be exercised for paper attendance sheets and anonymous questionnaires, as processing is not carried out by automated means or the data cannot be linked to an identifiable person.

8. Data security

Paper attendance sheets are stored in a locked location with controlled access. Access to digital copies is protected by permissions, and we use secure methods of transfer. When collecting signatures on site, we limit access to other participants' data by covering entries or having sheets completed individually. Anonymous sheets are handled separately. We do not carry out automated individual decision-making or profiling.

9. Your rights and available remedies

For personal data processed on the attendance sheet and recordings of you, you may request information and access, obtain a copy, and request correction of inaccurate data. Where the statutory conditions are met, you may request restriction of processing or erasure of data. The right to erasure is not absolute: retention of attendance data necessary for performing a public task, mandatory retention or legal claims may continue where justified. The rules in the section on recordings govern erasure of recordings processed on the basis of consent and withdrawal of consent.

You may object at any time, on grounds relating to your particular situation, to processing based on the performance of a task in the public interest. In that case, we stop processing unless compelling legitimate grounds or a legal claim justify its continuation. The right to data portability does not apply to attendance data processed on the public-task legal basis. As we do not request consent for this processing, it may be challenged by exercising the rights described above, rather than by withdrawing consent.

You may send your request to the postal or electronic address listed in the controller's contact details. We respond without undue delay, and no later than 1 (one) month. For complex or numerous requests, this period may be extended by a further 2 (two) months; we inform you of this and the reasons within the first month. Exercising your rights is generally free of charge. We request only the data necessary to identify you. If we refuse a request, we explain the reasons and the remedies available.

You may lodge a complaint with the Hungarian 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.; website: <https://www.naih.hu>. Email for information: ugyfelszolgalat@naih.hu. Proceedings before the authority cannot be initiated by ordinary email; submission methods are available at <https://www.naih.hu/ugyfelszolgalat-kapcsolat>, and electronic submissions may be made via e-Papír.

You may also lodge your complaint with the data protection supervisory authority in the Member State of your habitual residence, place of work or the place of the alleged infringement. You may seek a judicial remedy; under the GDPR, as a general rule, proceedings may be brought before the courts of the Member State where the controller is established or where you habitually reside. Under Section 23(3) of the Hungarian Act on Informational Self-Determination and Freedom of Information (Infotv.), the data subject may also choose to bring proceedings before the regional court with jurisdiction over their permanent or temporary place of residence.

10. Reading this notice and further data processing

We make this notice available before the attendance sheet is completed and the inclusion data sheet is submitted, and provide a copy on request. Receiving or reading this notice does not constitute consent to data processing. We do not request a name or signature on the anonymous inclusion data sheet to confirm that the notice has been read. Before making a recording, we also provide the information concerning recordings and separately request the consents specified in the section on recordings.

Documents on which this notice is based

Grant Agreement 101290333 TANDEM: Data Sheet, points 2 and 6; Articles 15, 20 and 25; Annex 1 data protection commitments. The domestic and international attendance sheets for Panagyurishte and the participant equality and inclusion data sheet.

Legislation: GDPR (EU) 2016/679; Act CLXXXIX of 2011. Available at: https://www.naih.hu/GDPR/GDPR_HU_korregendumokkal.pdf and <https://njt.jog.gov.hu/jogszabaly/2011-189-00-00>. NAIH contact details checked on: 5 October 2026.

Legislation applicable to recordings: GDPR Articles 5, 6(1)(a), 7, 13, 17, 19 and 20; Section 2:48 of Act V of 2013 on the Civil Code (<https://njt.jog.gov.hu/jogszabaly/2013-5-00-00.0>). For the interpretation of consent: European Data Protection Board Guidelines 05/2020 (<https://www.edpb.europa.eu>).