

DATA PROTECTION NOTICE

Last modified: 16 February 2026

Progressive BEX Kft. (hereinafter: **Data Controller** or **Progressive Advertising Agency**) hereby provides the following information (hereinafter: Notice) regarding the processing of personal data of data subjects, as well as their data protection rights and legal remedies. The Data Controller undertakes that all data processing related to its activities complies with the requirements set out in this Notice and in the applicable legislation, including the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR).

This Notice is continuously available on the www.borsuli.progressive.hu website.

Progressive Advertising Agency reserves the right to amend this Notice at any time. Data subjects will be duly notified of any changes in a timely manner.

If you have any questions regarding this Notice, please contact us at any of the contact details below and we will respond to your enquiry.

Progressive Advertising Agency is committed to protecting the personal data of data subjects affected by its data processing activities and considers it of paramount importance to respect the right of its clients to informational self-determination. Progressive Advertising Agency treats personal data confidentially and takes all security, technical and organisational measures necessary to guarantee the security of the data.

Progressive Advertising Agency hereby presents its data processing practices.

1. DATA CONTROLLER DETAILS

- Company name: Progressive Bex Kft.
- Address: 1118 Budapest, Ménesi út 22.
- Contact person: Bálint Buzási
- E-mail address: info@progressive.hu
- Company registration number: 01 09 325966

This Notice has been prepared on the basis of the following applicable legislation:

1. Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter: Info Act);
2. Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (hereinafter: E-Commerce Act);
3. Act XLVIII of 2008 on the Basic Conditions and Certain Limitations of Commercial Advertising Activities (hereinafter: Advertising Act);
4. Act C of 2003 on Electronic Communications (hereinafter: Electronic Communications Act);
5. Act CXIX of 1995 on the Processing of Name and Address Data for Research and Direct Marketing Purposes;
6. 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 (hereinafter: GDPR).

The Data Controller undertakes to comply with the provisions of this Notice and requests that visitors to its website (<https://events.progressive.hu>) review the provisions of this Notice before providing their personal data. The Data Controller reserves the right to amend this Notice, in which case the amendments shall take effect upon publication at <https://borsuli.progressive.hu/>.

Technical data:

Progressive Advertising Agency selects and operates the IT tools used for the processing of personal data in the course of providing its services in such a way that the processed data:

- is accessible to authorised persons (availability);
- its authenticity and authentication is ensured (authenticity of data processing);
- its integrity can be verified (data integrity);
- is protected against unauthorised access (data confidentiality).

Progressive Advertising Agency protects data with appropriate measures against unauthorised access, alteration, transmission, publication, erasure or destruction, as well as accidental destruction.

Progressive Advertising Agency takes appropriate technical, organisational and structural measures to protect the security of data processing, providing a level of protection commensurate with the risks associated with the data processing.

During data processing, Progressive Advertising Agency preserves:

- confidentiality: it protects information so that only those authorised may access it;
- integrity: it protects the accuracy and completeness of information and the processing method;
- availability: it ensures that when an authorised user needs it, they can actually access the desired information, and the related tools are available.

2. DEFINITIONS

The terms used in this Notice shall have the following meanings:

data subject: any natural person identified or – directly or indirectly – identifiable on the basis of specific personal data;

personal data: any data that can be associated with the data subject – in particular the data subject's name, identifying sign, as well as one or more characteristics specific to their physical, physiological, mental, economic, cultural or social identity – as well as any conclusion drawn from the data relating to the data subject;

consent: a voluntary and definite expression of the data subject's will, which is based on adequate information and by which the data subject gives their unambiguous agreement to the processing of personal data relating to them – either in full or limited to certain operations;

objection: a statement by the data subject objecting to the processing of their personal data and requesting the cessation of the processing or the erasure of the processed data;

data controller: the natural or legal person, or organisation without legal personality, who or which alone or jointly with others determines the purpose of the processing of data, makes and implements decisions regarding the processing (including the tools used), or has them implemented by a data processor;

data processing (as an activity): any operation or set of operations performed on data, regardless of the procedure applied, including but not limited to collection, recording, registration, organisation, storage, alteration, use, querying, transmission, publication, harmonisation or combination, blocking, erasure and destruction, as well as prevention of further use, taking of photographs, audio or video recordings, and recording of physical characteristics suitable for identifying a person;

data transfer: making data accessible to a specified third party;

publication: making data accessible to anyone;

data erasure: rendering data unrecognisable in such a way that its recovery is no longer possible;

data marking: providing data with an identifying mark for the purpose of distinguishing it;

data blocking: providing data with an identifying mark for the purpose of permanently or temporarily restricting its further processing;

data destruction: the complete physical destruction of the data carrier containing the data;

data processing (technical): the performance of technical tasks related to data processing operations, regardless of the method and tools used to carry out the operations and the place of application, provided that the technical task is performed on the data;

data processor: any natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller;

data set: the entirety of data processed in a single register;

third party: any natural or legal person, or organisation without legal personality, who or which is not identical with the data subject, the data controller or the data processor;

data protection incident: the unlawful processing or handling of personal data, in particular unauthorised access, alteration, transmission, publication, erasure or destruction, as well as accidental destruction and damage.

3. PURPOSE OF DATA PROCESSING

On the events.progressive.hu website, for the purpose of communication related to events and event series organised by Progressive Advertising Agency, we collect the following data:

- name
- company name
- e-mail address
- telephone number

4. LEGAL BASIS OF DATA PROCESSING

The legal basis of data processing is the consent of the data subject (Article 6(1)(a) of the GDPR), which is given by completing and submitting the form.

5. DATA RETENTION PERIOD

We store the data until unsubscription or until the events / event series are discontinued.

6. RIGHTS OF DATA SUBJECTS

- You may request information about the data processing
- You may request rectification or erasure of your data
- You may restrict the data processing
- You may object to the data processing
- You may withdraw your consent

Additional data processing

The Data Controller also processes the personal data of data subjects in backups (for one month) on the basis of the legitimate interest of the Data Controller (Article 6(1)(f) of the GDPR), which is the protection of the Data Controller's IT system and the data stored therein. The hosting data processor partner in this regard is: Rackforest Zrt., 1132 Budapest, Victor Hugo utca 11, 5th floor, info@rackforest.hu. If the Data Controller intends to carry out further data processing, it shall provide prior information on the material circumstances of the data processing (including in particular: the legal basis of the processing, the

purpose of the processing, the scope of data processed, and the duration of the processing).

Information on the engagement of data processors and their activities related to data processing

Data processing for the storage of personal data	Data processor name: Rackforest Zrt. Data processor mailing address: 1132 Budapest, Victor Hugo utca 11, 5th floor. Data processor e-mail: info@rackforest.hu Rackforest Zrt. stores data on its own servers leased by Progressive Advertising Agency under a written contract. It is not authorised to access the personal data. In addition, the Data Controller has a development partner acting as a data processor supporting its website (Péter Kálmán, sole proprietor, 6726 Szeged, Vedres utca 12, peter.kalaman@westerlike.com), who may occasionally access personal data during and for the purposes of development activities.
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7. DATA SECURITY MEASURES

The Data Controller declares that it has taken appropriate security measures to protect personal data against unauthorised access, alteration, transmission, publication, erasure or destruction, accidental destruction and damage, as well as inaccessibility resulting from changes in the technology applied.

8. RIGHTS OF DATA SUBJECTS

8.1. During data processing, you are entitled to:

Right to information and fulfilment of data subject requests	The Data Controller shall take appropriate measures to provide data subjects with all the information referred to in Articles 13 and 14, and any communication under Articles 15 to 22 and 34 of the GDPR relating to the processing of personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language. During the period of data processing, you may request information from the Data Controller regarding the processing of your personal data, and you may exercise your further data processing rights by submitting a request to the Data Controller. The Data Controller shall inform you about the processing of personal data or measures taken in response to your request in an intelligible form, within the shortest possible time from the submission of the request, but no later than within one month. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by a further two months. The Data Controller shall inform the data subject of the extension within one month of receipt of the request, indicating the reasons for the delay. If the data subject submitted the request electronically, the information shall be provided electronically where possible, unless the data subject requests otherwise. If the Data Controller does not take action in response to the data subject's request, it shall inform the data subject without delay, and at the latest within one month of receipt of the request, of the reasons for the failure to act and of the possibility of lodging a complaint with a supervisory authority and seeking judicial remedy as described below.
Right to rectification	You are entitled to have inaccurate personal data relating to you rectified by the Data Controller without undue delay upon your request. You are also entitled to request the completion of incomplete personal data, including by means of providing a supplementary statement.

Right to erasure	You may request the erasure of your personal data if the personal data are no longer necessary for the purpose for which the Data Controller collected or otherwise processed them, you have withdrawn your consent to the processing of personal data (in the case of consent-based processing), you have objected to the processing (in the case of processing based on the legitimate interest of the Data Controller) and there is no overriding legitimate ground for the processing, the personal data have been unlawfully processed, or the personal data must be erased for compliance with a legal obligation under Union or Member State law applicable to the Data Controller.
Right to restriction of processing (blocking of data)	You may request that the Data Controller restrict the processing (block the personal data) if you contest the accuracy of the personal data (in which case the restriction applies for the period that enables the Data Controller to verify the accuracy of the personal data), the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use, the Data Controller no longer needs the personal data for processing purposes but you require them for the establishment, exercise or defence of legal claims; or you have objected to the processing (in which case the restriction applies for the period until it is determined whether the legitimate grounds of the Data Controller override your legitimate grounds).
Right to object	You are entitled to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interest of the Data Controller. In that case, the Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purpose. If you object to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for that purpose.
Right to withdraw consent	The data subject is entitled to withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing carried out prior to the withdrawal.

8.2. Legal remedies

The data subject may exercise the above-listed data protection rights by sending an e-mail to the Data Controller's e-mail address, or by post in a signed letter sent to the registered seat address, or by e-mail sent from an identifiable e-mail address of the data subject.

Without prejudice to the available administrative or non-judicial remedies – including the right to lodge a complaint with a supervisory authority – the data subject has the right to an effective judicial remedy if they consider that their rights under the GDPR have been infringed as a result of the processing of their personal data in a manner not compliant with the GDPR. Proceedings against the Data Controller must be brought before the courts of the Member State where the Data Controller has an establishment (Hungary). Such proceedings may also be brought before the courts of the Member State where the data subject has their habitual residence. In Hungary, such cases fall within the jurisdiction of the regional court (törvényszék). The data subject may also bring the action before the regional court having jurisdiction over their domicile or habitual residence. Information on the jurisdiction and contact details of the courts is available at: www.birosag.hu. You may also lodge a complaint with the National Authority for Data Protection and Freedom of Information:

Name	National Authority for Data Protection and Freedom of Information (NAIH)
E-mail	ugyfelszolgalat@naih.hu
Mailing address	1055 Budapest, Falk Miksa utca 9–11
Postal address	1363 Budapest, Pf.: 9.
Telephone	+36 (1) 391-1400

9. MISCELLANEOUS PROVISIONS

The Data Controller shall provide information on any data processing not listed in this Notice at the time of data collection. We inform our clients that courts, prosecutors, investigative authorities, administrative offence authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information, and other bodies authorised by law may contact the Data Controller for the purpose of providing information, disclosing, transferring data or making documents available.

Progressive Advertising Agency shall disclose personal data to authorities – where the authority has specified the precise purpose and scope of the data – only to the extent strictly necessary for achieving the purpose of the request.