FÉLFA MARATON

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PRIVACY POLICY AND DATA PROCESSING NOTICE

Version: V001
Effective from: 2026.05.01
Website: www.felfamaraton.hu

Event: **FÉLFA MARATON**
Planned date of the Event: **22 August 2026**
Event locations: Gálosfa, Bőszénfa, Simonfa, Hajmás, Kaposgyarmat and the Zselic region

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1. Introduction

The purpose of this Privacy Policy and Data Processing Notice is to provide visitors of the FÉLFA MARATHON website, participants registering for the event, volunteers, supporters, interested parties, newsletter subscribers, and any other natural persons providing data in connection with the event with transparent, clear and detailed information about what personal data the Data Controller processes, for what purpose, on what legal basis, for how long and in what manner.

The Data Controller is committed to the protection of personal data and carries out its data processing activities in accordance with the applicable Hungarian and European Union data protection rules, with particular regard to Regulation (EU) 2016/679 of the European Parliament and of the Council, namely the General Data Protection Regulation (GDPR), as well as Act CXII of 2011.

During the organisation of the FÉLFA MARATHON sports event, the primary purpose of data processing is to manage registrations, conduct the event safely and lawfully, inform participants, prepare result lists and start lists, coordinate volunteers, manage supporter relations, and — where the data subject has given separate consent or where an appropriate legal basis exists — maintain communication for communication, marketing and social media purposes.

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2. Data Controller Information

Name of the Data Controller: Baghy Csaba Sport Education & Consulting EV
Representative / Contact Person: Baghy Csaba
Registered Office: 6000 Kecskemét, Petőfi Sándor u. 18-20. ground floor 1.
Tax Number: 91463416-1-34
Registration Number / Sole Proprietor Registration Number: 61195253
E-mail: info@baghycsaba.com
Telephone: +36706225077
Website: www.felfamaraton.hu

If any further co-organiser, technical operator, timing service provider, registration system, payment service provider or Ötpróba partner participates in the organisation of the FÉLFA MARATHON, the relevant data controller or data processor role shall be recorded in the appropriate sections of this Policy.

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3. Scope of the Policy

This Policy applies to:

- visitors of the FÉLFA MARATHON website;
- participants registering for and participating in the race;
- legal representatives in the case of minor participants;
- volunteer applicants and volunteer assistants;
- sponsors, supporters and partner contacts;
- newsletter subscribers;
- persons filling out contact forms;
- persons appearing at the event where photo, video or audio recordings are made;
- participants in the Ötpróba points collection programme possessing an Ötpróba ID.

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4. Definitions

Personal data:	any information relating to an identified or identifiable natural person, such as name, e-mail address, telephone number, date of birth, address, registration data, bib number, Ötpróba ID or image.
Data subject:	the natural person whose personal data is processed by the Data Controller.
Data Controller:	the person or organisation that determines the purposes and means of processing personal data.
Data Processor:	the person or organisation that processes personal data on behalf of and according to the instructions of the Data Controller.
Data processing:	any operation performed on personal data, including in particular collection, recording, organisation, storage, alteration, use, transfer, deletion or destruction.
Consent:	the voluntary, specific, informed and unambiguous declaration of the data subject by which they consent to the processing of their personal data.
Data protection incident:	a security incident resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or unauthorised access to the personal data processed.
Ötpróba:	a recreational sports programme and points collection system in which participants may collect points based on distances completed at official events. If the FÉLFA MARATHON appears as an Ötpróba event, the transfer of personal data necessary for crediting Ötpróba points shall take place as a separate data processing purpose.

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5. Principles of Data Processing

The Data Controller follows the principles below during data processing:

1. Lawfulness, fairness and transparency: data processing is always carried out for a lawful purpose and in a manner understandable to the data subjects.
2. Purpose limitation: personal data may be processed only for specified, explicit and legitimate purposes.
3. Data minimisation: only data necessary for the fulfilment of the given purpose is requested.
4. Accuracy: the Data Controller endeavours to ensure that the processed data are accurate and up to date.
5. Storage limitation: data are retained only for as long as necessary.
6. Integrity and confidentiality: the Data Controller protects the data by appropriate technical and organisational measures.
7. Accountability: the Data Controller is responsible for ensuring that data processing complies with legal requirements.

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6. Registration Data Processing for the FÉLFA MARATHON

6.1 Purpose of Data Processing

The purpose of data processing related to registrations is receiving and confirming registrations, maintaining participant records, identifying participants, preparing start lists, issuing bib numbers, generating result lists, handling categories and awards, verifying eligibility for participation, communication, and fulfilling organisational and event safety related tasks.

6.2 Categories of Processed Data

The following data may be processed during the registration process:

- full name;
- e-mail address;
- telephone number;
- date of birth or age;
- gender;
- place of residence / country / city;
- selected race distance;
- registration category;
- bib number;
- T-shirt size or other event package related size information;

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- billing information;
- payment status;
- information entitling the participant to discounts;
- emergency contact name and phone number;
- voluntarily provided health or safety related information;
- Ötpróba ID if the participant requests Ötpróba point crediting;
- records and timestamps of declarations of consent.

6.3 Legal Basis

The processing of basic data related to registration is primarily necessary for the performance of the participation contract pursuant to Article 6(1)(b) of the GDPR. Certain data may be processed on the basis of compliance with a legal obligation, legitimate interest or the voluntary consent of the data subject.

Health-related or special category data may be processed only if their provision is voluntary, necessary for the safe organisation of the event, and the data subject has given explicit consent to such processing.

6.4 Retention Period

The Data Controller processes registration and participation data for the period necessary after the closing of the event. Data relating to contractual, accounting and taxation obligations shall be retained for the statutory retention period. Data processed solely on the basis of consent may be processed until the withdrawal of consent, unless further retention is justified by law or legitimate interest.

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7. Processing of Data of Minor Participants

In the case of registration of a minor participant, the Data Controller may process, in addition to the personal data of the minor, the personal data and consent declaration of the legal representative.

The processed data may include:

• name, date of birth and selected distance of the minor;

• name of the legal representative;

• e-mail address and telephone number of the legal representative;

• parental / legal representative consent declaration;

• health or safety information, if necessary.

When processing the data of minors, the Data Controller acts with increased care and processes only data necessary for participation in the event, contact, safety and legal compliance.

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8. Volunteer Data Processing

8.1 Purpose

Handling volunteer applications, assigning volunteers, maintaining contact, allocating tasks, keeping attendance records, arranging volunteer insurance or fulfilling other organisational obligations.

8.2 Processed Data

- name;
- e-mail address;
- telephone number;
- age;
- accommodation address;
- selected or undertaken task area;
- available time periods;
- clothing size if a volunteer T-shirt or equipment is provided;
- health or suitability information, if necessary;
- consent of the legal representative in the case of a minor volunteer.

8.3 Legal Basis

The legal basis for data processing is the contractual or pre-contractual data processing related to the volunteer application and cooperation, and in certain cases the consent of the data subject or the legitimate interest of the Data Controller.

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9. Sponsor, Supporter and Partner Data Processing

The Data Controller may process contact and contractual data during supporter, sponsor and partner cooperation related to the event.

Processed data may include:

- name of the contact person;
- position;
- e-mail address;
- telephone number;
- name of the organisation;
- billing data;
- other information related to the cooperation.

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The purpose of data processing is request for quotation, contact, conclusion of contracts, invoicing, performance certification and management of sponsor appearances.

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10. Payment and Invoicing Related Data Processing

During the payment of entry fees, sponsorships or other fees, the Data Controller processes data necessary for payment completion and invoicing.

10.1 Processed Data

- name;
- billing name;
- billing address;
- tax number where relevant;
- e-mail address;
- payment identifier;
- payment status;
- date of transaction;
- amount of entry fee;
- selected payment method.

10.2 Payment Service Providers

Planned / applicable payment solutions:

- OTP Bank / OTP payment solution: https://www.otpbank.hu/portal/hu/adatvedelem
- Stripe: https://stripe.com/en-hu/privacy
- Revolut Business / Revolut Pro: https://www.revolut.com/legal/privacy
- Számlázz.hu invoicing system: https://www.szamlazz.hu/adatvedelem

The Data Controller does not have access to bank card data.

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11. Ötpróba Related Data Processing and Data Transfer

If the FÉLFA MARATHON is accepted as an official Ötpróba points collecting event, the Data Controller processes the participant's Ötpróba ID and completion related data and transfers them to the operator of the Ötpróba system.

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11.1. Purpose of Data Processing

Crediting Ötpróba points, verifying the completed distance, identifying the participant in the Ötpróba system, and fulfilling the organiser's obligations arising from the Ötpróba cooperation.

11.2. Scope of Processed and Transferred Data

For the purpose of Ötpróba point crediting, the following data may be processed and transferred:

- Ötpróba ID;
- participant's e-mail address;
- completed distance / race event;
- fact of completion;
- completion time or result, if necessary for Ötpróba settlement;
- name and date of the event;
- bib number, if necessary for identification.

By registering for the Event, the Participant consents to the Organiser of the Event, as data controller, forwarding the e-mail address provided during registration to Nagy Sportágválasztó, BBU Nonprofit Kft., which coordinates the Ötpróba recreational sports programme, exclusively for identification necessary for Ötpróba point crediting.

The primary identifier of participants remains the individual Ötpróba identification number; however, checking e-mail addresses is also particularly important in order to achieve more efficient identification and subsequent point crediting. The e-mail addresses received in this manner are not stored or processed by Nagy Sportágválasztó, BBU Nonprofit Kft. (nor for marketing activities); they are used exclusively for point crediting in the event of a match.

11.3. Recipient

Operator of the Ötpróba system / Project Office:	Nagy Sportágválasztó, BBU Nonprofit Kft.
Registered office:	1106 Budapest, Maglódi út 12/B.
Website:	www.otproba.hu

11.4. Legal Basis

The legal basis for data processing related to Ötpróba point crediting may be:

- the voluntary consent of the data subject, where the participant expressly requests the crediting of Ötpróba points and provides their Ötpróba ID;
- performance of a contract, where participation in Ötpróba forms part of the registration process as a service requested by the data subject;
- the legitimate interest or legal/contractual obligation of the Data Controller, exclusively if this is properly supported by the Ötpróba organiser agreement.

11.5 Retention Period

The Data Controller processes the data necessary for Ötpróba point crediting for the period required to complete the point crediting, correct any errors and settle accounts with Ötpróba.

12. Contact and Customer Service Communication

If the data subject contacts the Data Controller by e-mail, telephone, online form or social media message, the Data Controller processes the provided data for the purpose of answering the inquiry and handling the matter.

Processed data:

• name;

• e-mail address;

• telephone number;

• content of the message;

• date of the inquiry;

• other data necessary for handling the matter.

The Data Controller retains inquiry data for the necessary period after the matter has been closed, especially if the communication relates to a contractual, financial or legal claim.

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13. Newsletter and Marketing Communication

The Data Controller sends newsletters, event notifications or marketing-related information exclusively on the basis of the data subject's prior, voluntary and explicit consent.

Processed data:

• name, if requested by the subscription form;

• e-mail address;

• date of subscription;

• fact of consent;

• technical data, such as IP address, if recorded by the system.

The subscriber is entitled to unsubscribe from the newsletter at any time.

Unsubscribing does not affect the lawfulness of data processing carried out before withdrawal.

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14. Processing of Photo, Video and Audio Recordings

The FÉLFA MARATHON is a public sports event where photo, video and audio recordings may be made. The purpose of such recordings is to document and promote the event, support press communication and social media appearances, and promote future events.

The Data Controller endeavours to ensure that the making and publication of recordings do not infringe the human dignity, privacy or legitimate interests of data subjects.

In the case of individual, featured, portrait-like or advertising-purpose use, the Data Controller may request separate consent from the data subject. In the case of crowd recordings, images presenting the atmosphere of the event or general documentation made at a public event, the legal basis for data processing may be the legitimate interest of the Data Controller.

The data subject may object to the publication of a recording made of them and may request its removal if it depicts them in an identifiable manner and there is no legal or disproportionate technical obstacle to removal.

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15. Result Lists, Start Lists and Public Sports Results

Due to the nature of the sports event, start lists and result lists may be published publicly on the website, in the registration system, on the interface of the timing service provider, and on the communication channels of the event.

The publicly displayed data typically include:

- name;
- bib number;
- race distance;
- age group or category;
- club or municipality, if provided in the registration system;
- completion time;
- placing.

The purpose of public result publication is the authentic documentation of sports results, ensuring transparency of the race and informing participants.

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16. Data Processors and Contributors

The Data Controller may use data processors and technical contributors during the organisation of the FÉLFA MARATHON.

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Possible categories of data processors:

• web hosting provider;

• web developer / system administrator;

• registration system provider;

• timing service provider;

• payment service provider;

• invoicing system provider;

• newsletter sending system provider;

• cloud-based document storage provider;

• photographer, videographer or media partner;

• operator of the Ötpróba system, if point crediting takes place.

Service Provider / Role / Scope of Processed Data / Data Processing Role / Privacy Link or Contract

Service provider name	Role	Scope of processed data	Data processing role	Privacy link / contract
Sybell Hosting	Website operation	web technical data, form data	data processor	[link]
Baghy Csaba EV Data Controller	Registration management	registration data	data processor / independent data controller	*this document*
[Timing service provider]	Start list, result list	name, bib number, distance, time result	data processor / independent data controller	*[to be completed]*
Számlázz.hu	Invoicing	billing data	data processor	[link]
Stripe	Payment processing	payment data	independent data controller / data processor	[link]
Nagy Sportágválasztó, BBU Nonprofit Kft.	Ötpróba point crediting	Ötpróba ID, completed distance, necessary completion data	independent data controller / joint controllership to be verified	[link]

17. Data Transfers

The Data Controller transfers personal data to a third party only if:

• the data subject has consented to the data transfer;

• the data transfer is necessary for the performance of a contract;

• the data transfer is necessary for compliance with a legal obligation;

• the data transfer is justified by legitimate interest and the rights of the data subject do not override it;

• the data transfer is necessary for authority, court or legal claim enforcement purposes.

Data transfer may take place in particular to:

• the timing service provider;

• the registration system;

• payment and invoicing service providers;

• the operator of the Ötpróba system for the purpose of point crediting;

• authorities in the event of a legal obligation;

• medical or rescue contributors in an emergency.

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18. Cookies and Website Technologies

The website may use cookies and similar technologies to ensure the operation of the website, improve the user experience, perform statistical analysis and — subject to separate consent — support marketing measurement.

Types of cookies:

1. **Essential cookies:** necessary for the basic operation of the website.
2. **Statistical cookies:** support the analysis of traffic and user behaviour.
3. **Marketing cookies:** support advertisements, campaigns and social media measurements.

Non-essential cookies may be used only on the basis of the data subject's prior consent.

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19. Google Analytics and Other Measurement Systems

The website may use Google Analytics or other web analytics services to analyse traffic and user behaviour.

The purpose of using the measurement system:

• measuring website performance;

• preparing visitor statistics;

• analysing the effectiveness of campaigns;

• developing the website.

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20. Social Media

Data processing related to content appearing on the social media platforms of the FÉLFA MARATHON — for example Facebook, Instagram, YouTube, TikTok or other platforms — is partly carried out according to the data processing rules of the given social media platform.

The purposes of the Data Controller's social media data processing are:

- promoting the event;
- informing interested parties;
- community building;
- sharing event photos and reports;
- handling messages and comments.

The data subject is responsible, according to the settings of the given platform, for their comments, reactions and public profile data published on social media platforms.

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21. Data Security

The Data Controller ensures the protection of personal data by appropriate technical and organisational measures. In this context, it particularly endeavours to:

- prevent unauthorised access;
- limit access rights;
- use password-protected systems;
- ensure secure data storage;
- apply data backups;
- enter into appropriate agreements with data processors;
- store paper-based documents securely;
- delete or anonymise data that have become unnecessary.

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22. Handling of Data Protection Incidents

In the event of a data protection incident, the Data Controller shall immediately investigate the event, take the necessary mitigating measures and, where required by the GDPR, notify the National Authority for Data Protection and Freedom of Information of the incident.

If the incident is likely to result in a high risk to the rights and freedoms of data subjects, the Data Controller shall also inform the data subjects.

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23. Rights of Data Subjects

The data subject is entitled to:

1. request information on the processing of their personal data;
2. request access to the processed personal data;
3. request rectification of inaccurate data;
4. request deletion of data where there is no further legal basis for processing;
5. request restriction of data processing;
6. object to processing based on legitimate interest;
7. request data portability where the legal conditions are met;
8. withdraw their consent at any time;
9. lodge a complaint with the supervisory authority;
10. apply to court in the event of infringement of their rights.

The Data Controller shall respond to requests from data subjects without undue delay and within no more than one month. If necessary, this deadline may be extended in accordance with the provisions of the GDPR.

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24. Legal Remedies

If the data subject considers that the processing of their personal data is unlawful, they may first contact the Data Controller at the following contact details:

E-mail: info@baghycsaba.com

The data subject may also lodge a complaint with the supervisory authority:

National Authority for Data Protection and Freedom of Information (NAIH)
Mailing address: 1363 Budapest, Pf.: 9.
Registered office: 1055 Budapest, Falk Miksa utca 9–11.
Telephone: +36 (1) 391-1400; +36 (30) 683-5969; +36 (30) 549-6838
E-mail: ugyfelszolgalat@naih.hu
Website: www.naih.hu

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25. Main Legal Sources Underlying Data Processing

- Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation (GDPR);
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information;
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services;
- Act XLVIII of 2008 on the basic conditions and certain restrictions of commercial advertising activities;
- Act C of 2000 on Accounting;
- Act CL of 2017 on Tax Administration;
- the Civil Code;
- the legislation in force from time to time relating to the organisation and conduct of sports events.

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26. Final Provisions

This Privacy Policy shall enter into force on the date of publication. The Data Controller reserves the right to amend this Policy, in particular if legislative changes, technical modifications, the involvement of a new data processor, the introduction of a payment system, the finalisation of the Ötpróba agreement or changes in the organisation of the event make this necessary.

The current version of the Policy is always available on the official website of the FÉLFA MARATHON.

Date: **2026.05.01**
Data Controller: **Baghy Csaba Sport Education & Consulting EV**
Contact: info@baghycsaba.com