

# DOCUMENT RETENTION GUIDE HUNGARY

A QUICK REFERENCE GUIDE TO HELP YOU BETTER UNDERSTAND  
LEGAL REQUIREMENTS AND RECORDS MANAGEMENT BEST PRACTICE

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# A QUICK GUIDE TO RECORDS MANAGEMENT AND RETENTION

## DELIVERING EFFECTIVE AND COMPLIANT RECORDS MANAGEMENT:

Meeting your corporate data challenges

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The benefits of compliant records management

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Records management case studies



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## MEETING YOUR CORPORATE DATA CHALLENGES

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We are all faced with an ever increasing volume of records, including emails and traditional paper documents. Legislation and regulation covering records management is so complex and far-reaching that compliance can become a major challenge as well as a drain on your resources. This makes a mandatory retention policy indispensable for minimising both business risks and the chance of costly litigation, caused either by destroying information before, or retaining it beyond, the end of its legally required retention period.

This guide gives you an overview of the regulations governing record retention and the relevant legal issues. The quick references help you cut through the complexity and get a clear picture of different record types and their business functions, as well as the legislation that affects them. It also offers practical suggestions to meet challenges.

### WHY COMPLY?

Fines for non-compliance are increasing

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Risk of investigatory audits by the authorities

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Reputational risks are substantial with an ever less tolerant public

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Risk of prosecution, claims for damages or claims for injunctions in civil proceedings

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It pays to be compliant: don't store what you don't need to

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An inventory is not a maybe, it's a must

**'BECAUSE I DON'T KNOW WHAT TO KEEP AND WHAT TO DESTROY, I'M STORING TOO MUCH AND EXPOSING MYSELF TO CONSIDERABLE LEGAL RISK.'**

**'DESTRUCTION IS AN ARBITRARY PROCESS THAT I CAN'T CONTROL.'**

**'I HAVE TO RE-EVALUATE MY PROCESSES EVERY TIME A NEW REGULATION COMES OUT.'**

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## THE BENEFITS OF COMPLIANT RECORDS MANAGEMENT

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Effective records management is about planning, organising and controlling the different stages in the life of a record – from its creation, through its active and inactive periods, to its destruction or permanent storage. Efficient records management meets the dual needs of providing easy retrieval of information while keeping costs to a minimum.

A comprehensive records management programme gives you immediate and long-term benefits:

### Controlling record volumes

Implementing a records retention schedule and destroying unnecessary records can cut your physical and digital storage requirement by up to 40%. Managing the creation of new records will reduce the costs of organising, maintaining and disposing of them.

### Improving access to information

With the right systems and procedures in place you can respond faster to business challenges, provide better customer service and make informed decisions.

### Ensuring regulatory compliance

You're faced with a multitude of industry-specific rules, national laws and European regulations on corporate bookkeeping and records conversion, retention and maintenance. A records management programme determines which records must be kept and for how long, in order to remain compliant.

### Improving efficiency and productivity

Poor record keeping and badly managed or non-integrated systems mean costly delays when searching for misfiled records and prevents timely meeting of e-discovery orders or governmental subpoenas.

### Safeguarding critical information

It is estimated that more than a third of all businesses that suffer a disaster never resume operations. An efficient records management programme ensures that you have protected copies of all business-critical records.

## WHAT DOES COMPLIANCE INVOLVE?

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Knowing the requirements – European, national and sector

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Seeking appropriate legal advice to help you create your own retention schedule

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Closed chain of custody – knowing what you've got and where it is, and monitoring who gained access for what purposes

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Secure, organised storage

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Secure, timely destruction

**AMONG EUROPEAN MID-MARKET BUSINESSES, 27% HAVE COMPANY POLICIES FOR THE SAFE STORAGE AND DISPOSAL OF CONFIDENTIAL INFORMATION.**

**IN EUROPE, 60% OF MID-MARKET BUSINESSES MONITOR THEIR STRATEGY FOR MANAGING STRUCTURED AND UNSTRUCTURED INFORMATION IN DIGITAL AND PHYSICAL FORMATS.**

SOURCE: BEYOND GOOD INTENTIONS, THE NEED TO MOVE FROM INTENTION TO ACTION TO MANAGE INFORMATION RISK IN THE MID-MARKET, PWC REPORT IN CONJUNCTION WITH IRON MOUNTAIN, 2014

## RECORDS MANAGEMENT CASE STUDIES

The following are some examples of different companies across Europe that enjoyed the benefits of an effective records management strategy.

### MANUFACTURING - BAE SYSTEMS

#### The challenge

BAE Systems is one of the world's leading defence manufacturers employing over 100,000 people in locations across the world. In 2004, the company identified a problem. Paper records were stored in disparate locations ranging from cupboards to large containers and document retrieval processes entailed a risk of loss or damage. BAE was looking for a solution that would help better organise its information and safeguard their valuable information assets in highly secure facilities.

#### The solution

Dedicated Iron Mountain experts work on-site to manage indexing, storage, retrieval and transport

200,000 cubic feet of records stored at Iron Mountain facilities which meet the stringent security standards required

Highly classified documents stored in dedicated vault with relevant Iron Mountain staff vetted by the Ministry of Defence

Iron Mountain catalogues statutory retention periods and carries out secure destruction as appropriate

IM Connect™, the Iron Mountain online customer portal, allows authorised BAE personnel to find documents and securely request retrieval

#### Value

BAE Systems has benefited from enhanced customer confidence in a highly security-conscious industry.

### PROFESSIONAL SERVICES - KPMG - THE NETHERLANDS

#### The challenge

KPMG The Netherlands offers audit and tax consultancy services. The company has over 4,000 employees in 15 offices across the Netherlands. Audit firms in the Netherlands have to comply with strict regulations governing records management. The company found that requirements for the safe storage and transport of documents were making these operations too complicated and expensive to handle themselves.

#### The solution

Iron Mountain active file management offered KPMG The Netherlands the dual benefits of fast, authorised access and compliant, secure storage

Twice-daily scheduled visits by vetted Iron Mountain staff pick up and drop off required documents in state-of-the-art secure vehicles

Barcode scanning and a strict chain of custody make files fully traceable, and support compliance with strict regulations

#### Value

As well as being able to meet compliance needs, KPMG The Netherlands has reduced costs and saved space.



# BEST PRACTICE TO IMPLEMENT A COMPLIANT RECORDS MANAGEMENT PROGRAMME

WITH REGARD TO COMPLIANCE, A 'RECORD' REFERS TO ALL DOCUMENTS IN WHATEVER MEDIUM, RECEIVED OR CREATED BY AN ORGANISATION IN THE COURSE OF ITS BUSINESS, AND AS EVIDENCE OF ITS ACTIVITIES OR BECAUSE OF THE INFORMATION CONTAINED



To comply with current regulations, an information management programme must include documented policies covering retention and disposal, as well as documented procedures covering proof of training, communication and implementation throughout the organisation.

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## FOUR STEPS TO A COMPLIANT RECORDS MANAGEMENT PROGRAMME

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The four steps below describe best practices that can help you with the ongoing development of your own compliant information management programme.

**1**

### CREATING A RECORDS RETENTION POLICY

#### **STEP ONE: CREATING A RECORDS RETENTION POLICY**

The records retention policy dictates how long a record should be stored before it is destroyed. To develop an effective policy, your company must have a thorough understanding of the records that it stores across all formats, including paper documents, electronic files, telephone call records and social media.

**2**

### INDEXING AND ARCHIVING OF RECORDS

Research must be conducted to determine the relevant national and industry regulations for different record types. This guide will provide an overview, but you are advised to also seek specialist legal advice to ensure you are compliant with all relevant obligations for your company.

**3**

### ENSURING CERTIFIED DESTRUCTION OF RECORDS

As well as the information provided in the guide, seek specialist legal advice to determine:

What are the applicable document retention laws in your country?

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**4**

### OFF-SITE STORAGE OF BACKUP DATA

Which document retention laws are applicable to your industry?

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What are the financial penalties and other consequences of non-compliance?

For a more in-depth guide to these four steps, download the Path to Compliance ebook 'Implementing a Compliant Records Management Programme' at

[ironmountain.co.uk/compliance](http://ironmountain.co.uk/compliance)



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## FOUR STEPS TO A COMPLIANT RECORDS MANAGEMENT PROGRAMME

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### STEP TWO: INDEXING AND ARCHIVING OF RECORDS

Effective indexing and archiving of records will ensure you can easily locate files and rapidly retrieve them as and when they are needed. Many organisations consider the scanning or digitising of paper documents an effective way to index and archive files while reducing costs through space saving. The above information covers some of the issues to consider when scanning and storing documents to protect their legal integrity, and here are some further do's and don'ts when implementing a scanning programme:

#### Get staff support

This is essential for the successful conversion to digital information. Without staff support, employees may make their own copies and print outs, resulting in unstructured archives in multiple locations.

#### Get legal advice

Take the time to survey the regulatory landscape for your country and industry, and build in the ability to meet any regulatory requirements from the outset.

#### Only digitise what you need

Documents from existing files that will rarely be retrieved should only be absorbed into the digital system if and when they are actually required.

#### Use internal and external experts

Staff who use the documents regularly are in the best position to recommend effective tags and labels, guided by external experts.

**Effective methods of indexing and archiving print and digital documents are discussed in more detail in the Path to Compliance ebook 'Implementing a Compliant Records Management Programme' at**

[ironmountain.co.uk/compliance](http://ironmountain.co.uk/compliance)

## FOUR STEPS TO A COMPLIANT RECORDS MANAGEMENT PROGRAMME

### STEP THREE: ENSURING CERTIFIED DESTRUCTION OF RECORDS

Before destroying any documents in accordance with your retention schedule, you should also be aware of the following:

#### Legal

Check with your legal department to ensure documents are not required for any ongoing legal proceedings or statutory minimum retention periods.

#### Chain of custody

Confidential waste needs to be tracked from the moment it is designated for destruction until it is destroyed. For certain documents certification of destruction is required.

#### Standards

There are standards that govern secure destruction. Standards cover security processes and the size of the pieces of shredded paper to ensure your confidential information cannot be reconstituted.

#### Costs

If a 200 employee company produces an average of 400kg paper waste per week, of which 15% is confidential, what are the costs of secure destruction? If an average machine shreds 2.5kg per hour it would take 24 employee hours per week to shred. On a junior's salary of £25,000/€30,000, annual destruction costs could be around £15,000/€18,000.

Source: Secure Information Destruction, Iron Mountain, 2011

#### Environment

Recycling one tonne of shredded paper can save around 15 trees, helping meet environmental targets for your organisation.

Source: Baxter CVG case study

### STEP FOUR: OFF-SITE STORAGE OF BACKUP DATA

Ensure your current data backup programme enables you to answer the following questions:

What conditions are your media stored in to protect against environmental damage?

How quickly and easily can you access your backup data in the event of an emergency?

How is your data stored to protect against security breaches without compromising the availability of data that will benefit your business?

What processes do you have available if you are unable to locate a specific file?

Do you have/require a mix of encrypted and unencrypted data?

**'40% OF COMPANIES  
CONSIDER NATURAL  
DISASTER TO BE THE  
BIGGEST THREAT  
TO INFORMATION  
SECURITY.'**

SOURCE: EXTREME WEATHER AND BUSINESS CONTINUITY, IRON MOUNTAIN, 2012

# LEGAL ISSUES THAT AFFECT YOUR RECORDS MANAGEMENT

A COMPREHENSIVE RECORDS MANAGEMENT PROGRAMME HAS TO TAKE INTO ACCOUNT ALL LEGAL ISSUES WHICH AFFECT THE CREATION, CONVERSION, RETENTION AND DESTRUCTION OF RECORDS. THESE LEGAL ISSUES INCLUDE:

Requirements to set out in writing

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Evidentiary value of electronic records

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Legal requirements in respect of the books and records of companies

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ISO standards

## LEGAL ISSUES THAT AFFECT YOUR RECORDS MANAGEMENT

The following main legal issues must be considered when planning a comprehensive records management programme:

Legal requirements that certain contracts be set out in writing

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Whether legal obligation exists to retain certain records in paper format

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Legal requirements in respect of the conversion of written records which belong to a company's administration into electronic format

Related issues are:

The evidentiary value of electronic records

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International technical norms and standards for the conversion to, retention, and accessibility of electronic records

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The minimum and maximum retention periods applying to the records

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## REQUIREMENTS TO SET OUT IN WRITING

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Under Hungarian law, certain agreements or instructions have to be set out in writing. General examples include:

An employment agreement between an employer and employee

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The purchase of a real estate property

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The obligation by the employer to inform the employee of certain aspects of employment

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A quota (i.e. ownership interest held in a limited liability company) purchase agreement

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Agreement on independent commercial agency services

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A mortgage or pledge agreement

The requirement to set certain matters out in writing can also be prescribed by an agreement. Examples include:

The requirement that changes to an agreement are explicitly made in writing

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The requirement that certain notices are made in writing

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## EVIDENTIARY VALUE OF ELECTRONIC RECORDS

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### Electronic records as evidence in legal proceedings

In civil procedures, the electronic version (scan) of a paper record, or a print-out of that scan, can later serve as evidence of the contents and existence of the original paper record, when this original has been disposed of. However, a court may ascribe less evidentiary value to such a reproduction than it would to the original.

This lesser evidentiary value is a consequence of the possibility of alterations being made to an electronic record. The original record could be tampered with before it is scanned, or changes made in the electronic record itself. In both cases, the alterations could be made with relative ease and not be easily detectable. Additional problems can occur when the electronic record is converted to a different file type or transferred to another data carrier. If this renders the record less legible or inaccessible, its evidentiary value will also decrease.

Demonstrable measures may, however, be taken to safeguard the record's authenticity and integrity, preferably by means of a mandatory company policy on scanning and records retention. Measures to increase the evidentiary value of an electronic record entail implementing adequate safeguards to:

Ensure that the procedures employed to scan the original paper record lead to an electronic record that truly reflects the contents of the original

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Ensure the authenticity and integrity of the electronic record during its retention period

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Ensure the electronic record's accessibility and legibility during its retention period

### Practical relevance

If adequate technical measures are taken to ensure the authenticity and integrity of a digital document (whether digitally born or converted), courts in practice consider the digital version to serve as the initial proof of the existence and contents of the agreement. It is then up to the other party to prove the contrary. In practical terms, this results in more or less the same evidential position as with written documents (in which case proof to the contrary is also possible).

Moreover, in legal proceedings the authenticity of paper prints of electronic documents are rarely disputed on the basis that the electronic documents could have been tampered with. Provided the right technical measures have been taken, a born-digital agreement, or electronic copy of a paper original, may therefore have a similar evidentiary value as the paper document.



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## LEGAL REQUIREMENTS IN RESPECT OF THE BOOKS AND RECORDS OF COMPANIES

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### Minimum retention obligation

Under Hungarian law, companies have a retention obligation for certain types of records. Section 169 of the Hungarian Accounting Act prescribes that the original accounts and records of a company (the “company books and records”) be retained for a period of eight years. The records falling within the scope of this provision need to be retained in such a legible manner that the company can present them at any time, on request.

In connection with accounting documents originally made out in a format other than electronic, the obligation of retaining documents may be satisfied, in due observation of the legislation laying down provisions on making copies of paper-based documents by way of electronic means, if the applied method of reproduction contains facilities to permit the swift retrieval of all information contained in the original document in a perfectly legible form and safeguards to prevent the stored contents from being manipulated or corrupted.

Accounting documents made out in electronic format shall be retained in electronic format, in due observation of the legislation on digital archiving, with sufficient facilities to permit the swift retrieval of all information contained in the original document in a perfectly legible form and to contain safeguards to prevent the stored contents from being manipulated or corrupted.

### Maximum retention periods

To the extent records contain personal data as defined by the Hungarian Data Protection Act (Act no CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information), these records may not be kept (at least not in a form that allows data subjects to be identified - see below) for a longer period than is necessary for achieving the purposes for which the personal data were collected or subsequently processed. What period is “necessary” and therefore what maximum retention period applies differs per category of record and shall in no case be shorter than applicable statutory minimum retention periods.

After these maximum retention periods have lapsed, the documents should be either (i) disposed of, (ii) de-identified (i.e. all references to data subjects should be rendered unreadable), or (iii) stored in a closed archive. An exception can be created by means of a so-called “legal” or “tax hold notice”, issued by an authorised officer or department within the company. A legal or tax hold notice instructs relevant staff to suspend disposal, de-identifying or archiving of certain documents in the event of reasonable anticipation of litigation, tax audits or investigations. In such a case, the retention period may be prolonged until the ultimate limitation period, or in the event of pending litigation procedures, until execution has ended of a court judgment given in last instance.

This guide provides an overview of minimum as well as maximum data retention periods.

### Conversion requirements

The 13/2005 (X.27.) IHM Decree contains the rules applicable to making electronic copies of paper-based documents. Under the Decree, there are certain requirements to be fulfilled when making such copies, e.g. it must be ensured that imaging consistency is kept and an enhanced electronic signature must be attached to the electronic copy. The 114/2007 (XII.29.) GKM Decree on the Rules on Digital Archiving explicitly offers the possibility to transfer records to another type of data carrier when it comes to fulfilling the retaining obligation, provided this is done in a manner which precludes subsequent tampering with the document and protects the document from deletion, destruction, accidental destruction, damages and unauthorised access. The company required to comply with retaining obligations must ensure that the electronic documents remain legible during the prescribed retention period. When it comes to digitally archiving documents, certain conditions must be complied with.

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## ISO-STANDARDS

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In Hungary, no specific national standards concerning Information and Documentation in relation to records management apply. However, in practice ISO 15489 and the Model Requirements for the Management of Electronic Records ("MoReg") are applied in the context of records management.

# QUICK REFERENCE RETENTION GUIDE



## DOCUMENT RETENTION PERIODS

The following is a quick reference guide for document retention periods under Hungarian law as applicable and in force on 1 October 2014. Please note that this is not an exhaustive list and that legal document retention requirements may be subject to change. Please also see our general disclaimer on page 34.

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
<b>GENERAL COMPANY RECORDS</b>				
1	General obligation for retention of company accounts, books of account and records	Minimum 8 years	Once the document has been created	Section 169 of the Accounting Act
2	Shareholders' resolution (copy), Articles of incorporation (copy), Shareholders' register (original), Board resolutions (copy), Standing orders (copy), Boards' and shareholders' meetings minutes (copy), Supervisory Board's rules of procedure (copy), Supervisory Council's Rules of procedure (copy)	At least during the existence of the legal entity (also subject to section 169 of the Accounting Act. See section 1).	Once the document has been created	The law provides for no specific retention period in this regard, however, such documents are so essential that it is advisable to keep them during the existence of the company (see also clause 1 above)
3	Financial statements, audit reports, etc	Minimum 8 years	Once the document has been created	Section 169 of the Accounting Act
4	Profit and loss accounts	Minimum 8 years	Once the document has been created	Section 169 of the Accounting Act
5	Records and documents of the dissolved legal entity	Minimum 8 years	From the date of deletion of the company	Section 169 of the Accounting Act
6	Membership records in a cooperative association (original)	At least during the existence of the legal entity (also subject to section 169 of the Accounting Act. See section 1).	Once the document has been created	The law provides for no specific retention period in this regard, however, such documents are so essential that it is advisable to keep them during the existence of the company (see also clause 1 above)
7	Subsidy records and documents	At least during the existence of the legal entity (also subject to section 169 of the Accounting Act. See section 1).	Once the document has been created	The law provides for no specific retention period in this regard, however, such documents are so essential that it is advisable to keep them during the existence of the company (see also clause 1 above)
	Documents concerning agricultural subsidies	Minimum 8 years (except if a directly applicable EU rule provides otherwise)	From the last calendar year of the year, in which the subsidy was due	Act XVII of 2007 on the procedural rules concerning agricultural and piscatorial subsidies

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>TAX AND ACCOUNTING RECORDS</b>			
	<b>GENERAL TAXES</b>			
8	<p>General obligation of taxpayers to provide (upon request of the tax inspector) all information that may be relevant to their tax position, including all books, records and other data carriers</p> <p>Keeping an administration, including books, records and other data carriers from which the taxpayer can at all times show their rights and obligations in the interest of levying taxes</p> <p>Organisations are obliged to provide the tax inspector (only upon request) with information relevant to the tax liabilities of third parties</p> <p>In cases where an organisation is legally required to withhold tax payments to third parties (e.g. VAT)</p> <p>These organisations may also be required to provide, on their own initiative, the tax authorities with information about these third parties</p>	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act
	<b>VAT</b>			
9	<p>A company is obliged to keep records of all delivery of goods or services, all intra-European Community acquisitions, all imports and exports, and all other information relevant for VAT purposes</p> <p>General obligation to keep at least the following records: (i) VAT invoices sent and received; (ii) documentation relating to supplies and acquisitions within the EU; (iii) documentation relating to goods imported from, and exported to, outside the EU</p>	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 179 of the VAT ACT 2007
10	Obligation to keep records and other data carriers relating to the ownership of real estate and rights relating thereto			
	<b>CORPORATE INCOME TAX</b>			
11	Hungarian taxpayers are obliged to have available all information that deals with intra-group price setting, so that the Hungarian Tax Authorities can check transfer prices and other conditions agreed upon in intra-group transactions	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act



	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>TAX AND ACCOUNTING RECORDS</b>			
	<b>DIVIDEND WITHHOLDING TAX</b>			
12	Obligation to have an administration showing the payment of dividends, and the obligation to issue dividend notes			
	<b>GENERAL CUSTOMS TAX</b>			
13	Keep an administration as per the requirements set out in the General Customs Act, including books, records and other data carriers. General obligation of taxpayers to provide (upon request of the customs authority) all information which may be relevant to them, including making available all books, records and other data carriers	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act
	<b>LOCAL TAXES</b>			
14	Regional and municipal taxes (e.g. taxes levied under the Municipalities Act). Tax rates may differ per region.	At least until the claims by the Tax Authority (i.e. Municipality) have elapsed	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
<b>PAYROLL AND SALARY RECORDS</b>				
15	The withholding agent (generally the employer) must keep an administration of wages, including tax-exempt reimbursements. In addition, the employer needs to inform the employee on an annual basis of the total amount of wages earned, wage withholding tax, and social security withheld.	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act and Section 10 of the Personal Income Tax Act 1995
16	A company needs to include information about employees in its administration, including name, date of birth, tax registration number and address	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act and Section 10 of the Personal Income Tax Act
<b>TYPE OF DOCUMENTS LIKELY TO BE ALSO SUBJECT TO A MAXIMUM RETENTION PERIOD BASED ON DATA PROTECTION RULES</b>				
17	Payroll records (wages, tax and social security records, payslips, overtime compensation, bonuses, expenses, benefits in kind) Severance pay records (e.g. notification to and consent of the competent authorities regarding dismissal, decisions of the court regarding dismissal, correspondence with the competent authorities regarding dismissal, outplacement records, calculations of termination payments)	No specific maximum retention period, general rules apply. Minimum retention period: see section 15.		

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>HR/EMPLOYMENT/PENSION RECORDS</b>			
18	Employment contract	There is no specific provision on this. Claims arising out of employment elapse in three years, whereas claims arising out of criminal offenses elapse in five years and the maximum possible time of punishment, whichever is longer. With respect to any taxation issues, which may arise from the employment relationship, reference is also made to the General Tax Act as mentioned above (which stipulate that tax claims by the Tax Authority elapse in five years).	When employment ends	Section 286 of the Labour Code, Section 47 of the General Tax Act
19	Identification documents of foreign nationals (copy)			
20	Business data and documents concerning pension schemes and related subjects Administration regarding pension scheme (by pension administrator and pension association)	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act
21	Pension plans and schemes, career and talent development programmes, diversity programmes, other HR policies (e.g. alcohol and drugs policy, HIV/AIDS policy, personnel handbook), social plans	As for pension schemes, see clause 20 above		

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>HR/EMPLOYMENT/PENSION RECORDS</b>			
	TYPE OF DOCUMENTS LIKELY TO BE ALSO SUBJECT TO A MAXIMUM RETENTION PERIOD BASED ON DATA PROTECTION RULES			
22	Data of rejected job applicants, (e.g. application letters, CVs, references, certificates of good conduct, job interview notes, assessment and psychological test results)	Must be deleted without any delay (once it has turned out that the applicant has been rejected)	From the date the hiring procedure has ended	Section 4 of the Data Protection Act
23	Data concerning a temporary worker	No specific maximum retention period, general rules apply. Minimum retention period: at least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act
24	Reports on employee performance review meetings and assessment interviews (e.g. evaluations, employment application forms of successful applicants, copies of academic and other training received, employment contracts and their amendments, correspondence concerning appointment, appraisals, promotions and demotions, agreements concerning activities in relation to the works council, references and sick leave records)	No specific maximum retention period, general rules apply. Minimum retention periods: claims arising out of employment elapse in three years, whereas claims arising out of criminal offenses elapse in five years and the maximum possible time of punishment, whichever is longer.	When employment ends	Section 286 of the Labour Code

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	HR/EMPLOYMENT/PENSION RECORDS			
	TYPE OF DOCUMENTS LIKELY TO BE ALSO SUBJECT TO A MAXIMUM RETENTION PERIOD BASED ON DATA PROTECTION RULES			
25	Employee stock purchase and options records	No specific maximum retention period, general rules apply		
26	Copy of identification documents	No copy may be kept of ID cards under the opinion issued by the former Data Commissioner, which is likely to have been taken over by the Data Protection Authority.		
27	Expats records and other records relating to foreign employees (e.g. visa, work permit, residence permit of third-country nationals)	No specific maximum retention period, general rules apply. Minimum retention period: at least for the entire duration of the employment.	From the commencement of the employment	Section 71 of Act II of 2007 on the Admission and Right of Residence of Third-Country Nationals
28	Data concerning pension and early retirement	No specific maximum retention period, general rules apply. Minimum retention period: see section 20.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act



	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
<b>MEDICAL/SAFETY RECORDS</b>				
29	Medical (or occupational health & safety company doctor) files, medical documents in cases of a medical treatment contract	Medical documents must be retained for at least 30 years; final medical report must be kept for at least 50 years; records gained through imaging diagnostics must be kept for at least 10 years and the diagnosis made of the record must be kept for at least 30 years	From obtaining the data, making the record	Section 30 of the Act no XLVII of 1997 on the Management and Protection of Medical data and Related Personal Data
30	Floor plans and directions	There is no specific provision on this. Recommended is to keep as long as necessary for safety purposes.		
31	Work-related medical examinations related to hazardous substances	Medical documents must be retained for at least 30 years; final medical report must be kept for at least 50 years; records gained through imaging diagnostics must be kept for at least 10 years and the diagnosis made of the record must be kept for at least 30 years	From obtaining the data, making the record	Section 30 of the Act no XLVII of 1997 on the Management and Protection of Medical data and Related Personal Data
	Minutes of the periodical safety inspections of dangerous technological processes, the work equipment defined by the respective laws (Section 21 (2) Act XCIII of 1993 on Labour Safety) and work equipment that is subject to periodic safety inspections by virtue of a statutory provision, a standard or some other document concerning the safe operation and use of the equipment in question	Until, at least, the next periodical safety inspection. The periodical safety inspection is due once every 5 years, unless the relevant standard(s) or the operating manual prescribes more frequent inspections.	From the date the periodical safety inspection procedure has ended	Section 3 (2) of Decree No. 5/1993 (XII. 26.) MÜM of the Ministry of Labour on the implementation of Act XCIII of 1993 on Labour Safety
	Risk assessment documentation (report)	Minimum 5 years	From the date the risk assessment procedure has ended	Section 54 (5) of Act XCIII of 1993 on Labour Safety

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>MEDICAL/SAFETY RECORDS</b>			
32	List of employees who have worked under dangerous conditions or whose health has otherwise been under threat	Minimum 10 years in general and minimum 40 years for cancer-causing substances. Nevertheless, it is recommended to keep such data for 50 years, in view of the retention period listed under section 34 (the two decrees maintain a different retention period).	From the end of employment	Section 7 of the Eüm-SzCsM Decree no 25/2000 on the Chemical Safety of Workplaces
33	Register of employees who work with 3rd and 4th category biological agents			
34	Register of employees who work with cancer-causing substances	Minimum 50 years	From the last day of exposure	Section 17 of the Eüm-SzCsM Decree no 26/2000 on the Protection against Cancer-Causing Substances and Prevention of Diseases Caused by such Substances. As for cancer-causing substances, the relationship between Section 7 of the Eüm-SzCsM Decree no 25/2000 on the Chemical Safety of Workplaces and Section 17 of the Eüm-SzCsM Decree no 26/2000 on the Protection against Cancer-Causing Substances and Prevention of Diseases Caused by such Substances is not clear, thus, it is advisable to keep such data for 50 years.
35	Administration concerning measurements of radioactive substances	The user of atomic radioactive energy is required to keep data for a minimum of 5 years	From the end of the data providing obligation	Section 16 of the Act no CXVI of 1996 on the Atomic Energy
36	Records of radiation	The user of atomic radioactive energy is required to keep data for a minimum of 5 years	From the end of the data providing obligation	Section 16 of the Act no CXVI of 1996 on the Atomic Energy
37	Medical records of employees who have possibly been exposed to ionizing radiation	Minimum 50 years	From the last day of exposure	Appendix 2 of Annex 2 of the Eüm Decree no 16/2000 (VI.8.) on the Enforcement of Certain Provisions of the Act no CXVI of 1996 on the Atomic Energy

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>MEDICAL/SAFETY RECORDS</b>			
	TYPE OF DOCUMENTS LIKELY TO BE ALSO SUBJECT TO A MAXIMUM RETENTION PERIOD BASED ON DATA PROTECTION RULES			
38	Registration of work and rest periods (in appropriate format)	No specific maximum retention period, general rules apply		
39	Necessary data for emergency medical care, individual reintegration plans, individual treatment agreements, degree of incapacity for work, required workplace adaptations	No specific maximum retention period, general rules apply		

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>TRANSPORT RECORDS</b>			
40	Administration regarding transport of biofuels and biofuels stock control	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in 5 years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 47 of the General Taxes Act
41	Loading or unloading plan (by captain or terminal representative)	Minimum 6 months	From the acceptance of the loading plan	Section 13 c) of the GKM Decree no. 1/2004 (I.5.) on the Safe Loading of Sea-Going Vessels Carrying Mass Products
42	The captain of a ship on its way from an EU port, and the manager of the harbour it has just left, must both retain data passed onto the appropriate authorities as required by the Port Reception Facilities Directive (registration of quantity of waste and other materials on board)			

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
<b>ENVIRONMENTAL RECORDS</b>				
43	Data regarding chemicals or environmentally dangerous substances, and preparations for these which a company has manufactured, imported or supplied	Minimum 5 years	From the date the risk assessment procedure has ended	Section 54 (5) of the Act no XCIII of 1993 on Labour Safety
44	The names and addresses of the clients/buyers of the chemicals or environmentally dangerous substances and preparations			
45	Documents related to an environmental permit	No specific provision on this. The permit and the related documentation should be kept as long as the permit is effective and for at least 5 years thereafter, taking into account that civil claims elapse in 5 years.		Section 6:22 of the Civil Code (Act V of 2013)
46	Registered data concerning the recycling or disposal of waste materials (waste bookkeeping)	Minimum 5 years, in case of hazardous waste for minimum 10 years		Section 65 of Act CLXXXV of 2012 on waste, Government Decree no. 440/2012. (XII. 29.) on the obligations concerning keeping registers and supplying data in connection with waste management.
	Registered data concerning the transfer of industrial or hazardous waste to another party for collection or disposal			
	Documents on results of inspections on the discharge of domestic waste water			
	Documents containing audits on radioactivity and all results of measurements taken	See section 35	See section 35	See section 35
47	Relevant documents from the manufacturer concerning conformity assessment/ statement of an energy-consuming product			
48	Technical documentation and declaration of performance on construction products	Minimum 10 years	After the construction product has been placed on the market	Article 11 of Regulation (EU) No 305/2011
49	The recipient of subsidies for clean-up operations must retain administration regarding the rights and obligations, and receipts and payments, related to those subsidies			
	Documentation on activities of the (private) land user or the investor relating to soil protection	Minimum 5 years	Production of document	Section 47 of Act CXXIX of 2007 on Protection of Arable Lands

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>ENVIRONMENTAL RECORDS</b>			
50	Accident reports	Minimum 5 years	From the date of accident	Section 3 of the MüM Decree no 5/1993 (XII.26.) on the Enforcement of Certain Provisions of the Act no XCIII of 1993 on Labour Safety
51	A copy of the documents concerning the transfer of waste materials sent by the competent authority	Minimum 5 years	From the date of starting the transfer	Section 6 of Governmental Decree no 440/2012 on registration and data supply obligations in connection with waste materials
52	Documents containing train number, date and time of checks, identified irregularities, and measures taken			
53	The operator of a dumpsite must retain the description of the waste materials under certain circumstances	The register concerning the dumping activity cannot be destroyed or eliminated; it must be kept for unlimited period of time (may not be sorted out)		Section 65 of Act CLXXXV of 2012 on waste
54	The operator of a dumpsite must retain the samples of analysis done on the collected waste materials			
55	Written and electronic data from which information has been derived to describe the nature, quality and composition of the waste material			
56	Transmission systems operators need to retain all records of quality indicators			
57	Technical documentation based on Directive 2000/14 of the European Parliament and of the Council of 8 May 2000 on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors and EC statement			

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>INSURANCE RECORDS</b>			
58	Insurance policies	There is no specific provision on this	Civil claims elapse in five years from due date. Thus, the policy should be kept as long as it is effective and for 5 years from expiry.	Section 6:22 of the Civil Code (Act V of 2013)

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
	<b>MARKETING RECORDS</b>			
59	The use of automatic call systems without operator intervention and electronic messages for the sending of unrequested communications for commercial, non-commercial or charitable purposes is allowed, provided the sender can demonstrate that prior consent was given by the subscriber	Such data may be kept as long as it is justified and necessary for reaching a lawful aim		Section 4 of the Data Protection Act



	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
<b>PURCHASING RECORDS</b>				
60	An organisation is obliged to record all delivery of goods or services, all intra-European Community acquisitions, all import and export, and all other information relevant for VAT purposes	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 179 of the VAT Act
61	General ledger, accounts receivable department, accounts payable department, (procurement and) sales administration, inventory records	Minimum 8 years	Once the document has been created	Section 169 of the Accounting Act
62	Procurement records	Minimum 5 years	Contracting entities shall retain all documents connected to the preparation and conduct of public procurement procedures for 5 years following the conclusion of the procedure, and all documents related to the performance of public contracts for five years following fulfillment of the contract. Where a review procedure has been opened in respect of a public procurement procedure, the related documents shall be retained until the definitive conclusion of such procedure, or the conclusion of the judicial review where applicable, in any case for at least 5 years.	Section 34 (2) of the Act no CVIII of 2011 on Public Procurements
<b>TYPE OF DOCUMENTS LIKELY TO BE ALSO SUBJECT TO A MAXIMUM RETENTION PERIOD BASED ON DATA PROTECTION RULES</b>				
63	Debtors and creditors records	No specific maximum retention period, general rules apply		
64	Customers and suppliers records	Customers and suppliers records		

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
<b>LEGAL FILES/CONTRACTS &amp; AGREEMENTS</b>				
65	Intellectual property records	At least until the claims by the Tax Authority have elapsed. Tax claims by the Tax Authority elapse in five years.	The last day of the calendar year in which the taxes should have been declared or reported, or paid in the absence of a tax return or declaration	Section 179 of the VAT Act
66	Contracts, agreements and other arrangements	There is no specific provision on this	Civil claims elapse in five years from due date. Thus, agreements should be kept as long as they are effective and for five years from expiry.	Section 6:22 of the Civil Code (Act V of 2013)
	Data and documents gained in connection with the prevention of money laundering	Minimum 8 years	From the date of gaining knowledge of the information or, in certain cases, from the end of the service provider-client relationship	Section 28 of the Act no CXXXVI of 2007 on the Prevention of Money Laundering and Financing of Terrorism
67	Permits, licences, certificates	There is no specific provision on this. Permits should be retained until expiry		
68	Confidentiality and non-competition agreements (if a penalty is attached to the non-competition or confidentiality clause)	No specific provision on this. In general, civil claims elapse in five years, thus, the documents should be kept accordingly		Section 6:22 of the Civil Code (Act V of 2013)
69	Legal files concerning provision of services (e.g. by lawyers, accountants, notaries, architects, brokers, veterinary surgeons, etc)			
	Data gained during identity check by the attorneys at law	Minimum 5 years	From the date of gaining knowledge of the data, i.e. date of carrying out the identity check	Section 27/C (2) of the Act no XI of 1998 on Attorneys at Law
	Original documents on company foundation	Must be kept unlimited. Copies of the original documents are kept by the attorney at law in charge.	From the date of converting the documents into electronic format (the registration proceeding is an electronic proceeding) In case the attorney at law ceases his/her activities, the documents must be placed at the archives kept by the bar	Section 27/A (2) of the Act no XI of 1998 on Attorneys at Law

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
OTHER RECORDS				
70	Correspondence Registers of transfers into other EU countries			
71	The processing of personal data, if this differs from the process as notified to the DPA			
TYPE OF DOCUMENTS LIKELY TO BE ALSO SUBJECT TO A MAXIMUM RETENTION PERIOD BASED ON DATA PROTECTION RULES				
72	Personal data of employees in network systems, computer systems, communication equipment used by employees, access controls and other internal management/administration, registers on data transfers	As long as the employment relationship exists if the employer has prohibited private use of the computer, official email address and communication equipment	Please refer to the retention period	Section 4 of the Data Protection Act
73	Login and logout data of visitors	Such data may be kept as long as it is justified and necessary for reaching a lawful aim	From the date such data are obtained	Section 4 of the Data Protection Act
74	Camera recordings	In general, maximum 3 working days	From the date of the record	Section 31 of the Personal and Asset Protection Act

	DOCUMENT DESCRIPTION	RETENTION PERIOD	START OF THE RETENTION PERIOD	RELEVANT LEGAL PROVISION
OVERVIEW RETENTION PERIODS ADDITIONAL RECORDS <sup>1</sup>				
PRODUCTS AND PRODUCTION RECORDS				
75	Technical documentation of a product and documents proving technical compliance	Minimum 5 years	From the release of the product	Sections 7 (4), 10 (3) and 12 (3) of Act LXXXVIII of 2012 on the Market Supervision of Products
PHARMACEUTICAL RECORDS				
76	Registries to be kept by pharmacies	Minimum 5 years	From the last data entry	Section 20 of the EüM Decree (IX.19.) no 41/2007
77	The names and addresses of the clients/buyers of drugs and psychotropic substances and preparations	Minimum 5 years	From the date of issuance of the document	Section 29 (2) of the Governmental Decree no 66/2012 on Activities with Drugs and Psychotropic Substances

<sup>1</sup> Please note that these records are provided in addition to the records listed in the general schedule. This does not imply that the other jurisdictions do not have retention periods for those records.

### Szecskey

Szecskey Attorneys at Law is considered one of the premier independent firms in Hungary with international practice. In addition to having the capabilities to provide services throughout Hungary, we also have access to cross-border legal services in Europe and worldwide through international networking channels in cooperation with highly reputed correspondent firms, such as the Best Friends network, and other legal networks (World Services Group (WSG), Eurojuris, Legalink, Lexicom, Biolegis, Legus, IBLC, INBLF, Libralex, State Capital Group) comprising firms from almost all over the world. Being able to draw on its close connections, the Firm is able to seamlessly handle any international transaction on which it is mandated to work.

The Firm is in the top firms in Hungary and belongs to the group of firms with international practice and clientele. Although there are no official rankings in Hungary, the Firm has been frequently referred to in publications such as Chambers Global, Global Counsel 3000 and the European Legal 500.

In fact, it was named "IFLR 2007 LAW FIRM OF THE YEAR" in recognition of its significant participation in the some of the year's most important transactions. In November 2011 our firm won the award "Law Firm of the Decade" on the basis of the votes that the Hungarian Venture Capital Association received from its venture capital investor, venture capital fund manager and legal and professional consultant members, for the M&A transactional works done over the past two decades and the public advocacy help continuously provided to the Association.

The Firm provides a full range of legal advice and assistance to the business community and over the past 20 years has been involved in a large number of M&A transactions. The Firm typically acts for large local enterprises - established by multinational companies, or traditional Hungarian privatized corporations owned by large local investors - in connection with M&A, corporate, commercial, regulatory, environmental, employment, insolvency, data protection and real estate matters.

More information: [www.szecskey.com](http://www.szecskey.com)

This Document Retention Guide Hungary 2014 (the “Guide”) is jointly issued by Szecskay Attorneys at Law, De Brauw Blackstone Westbroek and Iron Mountain. The Guide provides an overview of the document retention periods in Hungary as applicable and in force on 1 October 2014. Please note that the Guide is not an exhaustive list and that legal document retention requirements may be subject to change. The information contained in the Guide should not be relied or acted upon without first seeking the advice of a competent legal adviser. Szecskay Attorneys at Law, De Brauw Blackstone Westbroek and Iron Mountain shall not be liable for any damages resulting from any use of the information contained in the Guide.

#### De Brauw

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#### Iron Mountain

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