

Hungary Information Self-Determination and Freedom of Information Act (Act CXII of 2011)

Act CXII of 2011 protects informational self-determination and regulates collection, processing, and disclosure of personal data in Hungary.



What it is

The Hungary Information Self-Determination and Freedom of Information Act — Act CXII of 2011 is a national data protection and privacy regulation that governs the collection, processing, and disclosure of personal data within Hungary. Its primary purpose is to safeguard individuals’ right to informational self-determination while enabling transparency and accountability in the handling of personal data.

Enacted and enforced by the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), Act CXII applies to both public and private entities that process personal information. The Act covers areas such as data subject rights, lawful processing, data security requirements, and obligations related to freedom of information, aligning with broader European data protection principles and supporting compliance with the General Data Protection Regulation (GDPR).

At a glance

PUBLISHER National Authority for Data Protection and Freedom of Information (NAIH)	TYPE Regulation	VERSION Act CXII of 2011 — Information Self-Determination and Freedom of Information
EFFECTIVE January 1, 2012	DOMAIN Privacy	FAMILY Global Privacy Regulations
REGION Hungary	ADOPTION MODEL Regulatory Compliance	IMPLEMENTATION COMPLEXITY High

Source: <https://www.naih.hu>

Why it matters

- Strengthen data protection practices** Ensure systematic safeguards are in place to prevent unauthorized access, loss, or misuse of personal information.
- Enhance regulatory alignment** Facilitate alignment with national and European data protection laws, supporting cross-border compliance requirements such as GDPR.
- Support transparency and accountability** Promote trust by ensuring organizations provide clear information about data processing and respond to data subject requests.
- Increase audit readiness** Enable structured documentation and evidence of compliance for supervisory authority inspections and regulatory audits.

How SmartSuite supports Act CXII/2011 (Hungary)

Personal Data Inventory and Mapping Track personal data assets, systems, and data flows across the organization.	Records of Processing and Legal Basis Tracking Maintain documentation of processing activities and legal bases for processing personal data.	Data Subject Rights Workflows Automate access, correction, and deletion requests with deadlines and audit trails.
Privacy Risk and Impact Assessments Track privacy impact assessments, approvals, mitigation tasks, and compliance evidence.	Vendor and Processor Oversight Monitor vendors and processors that handle personal data on behalf of the organization.	Privacy Compliance Reporting and Audit Readiness Provide dashboards and reports showing privacy program coverage and regulatory readiness.

Common framework mappings

- APEC PF
- GDPR
- ISO 27001:2022
- ISO 27701
- ISO 29100
- NIST Privacy Framework v1.0

Official resources

Hungary Information Self-Determination and Freedom of Information Act – Act CXII of 2011 Provides the full legal text of Hungary's data protection and privacy regulation. naih.hu/files/Act-CXII-of-2011_EN_15.11.2016-003-.pdf	NAIH Guidance on Data Protection Compliance Outlines compliance requirements and best practices for organizations under the Act. naih.hu/guidelines.html
Data Protection Impact Assessment Guide Describes the process for conducting impact assessments under Hungarian data protection law. naih.hu/dpia-guide.html	

Frequently asked questions

What is the Hungary Information Self-Determination and Freedom of Information Act (Act CXII of 2011) used for? The Act is designed to protect individuals' personal data and ensure their right to informational self-determination. It establishes requirements for lawful collection, processing, storage, and disclosure of personal information and mandates public access to data held by public authorities.
Is compliance with Act CXII of 2011 mandatory for organizations in Hungary? Yes, compliance with Act CXII is mandatory for any public or private entity that processes personal data in Hungary. Organizations are legally required to implement appropriate data protection measures and ensure the rights of data subjects are respected.
What is the scope of Act CXII of 2011? Act CXII applies to all controllers and processors handling personal data in Hungary, regardless of whether the entity is public or private sector. The Act covers various categories of data, with certain exemptions for national security, law enforcement, and other specific cases as outlined in the law.
What are the key compliance requirements under Act CXII? Key requirements include transparent data processing, honoring data subjects' rights, implementing appropriate technical and organizational security controls, appointing responsible data protection roles, and maintaining documentation to demonstrate accountability.

How does an organization implement Act CXII requirements?

Implementation typically involves conducting data protection impact assessments, developing internal data protection policies, providing staff training, and setting up processes for managing data subject requests and breach notifications. Periodic audits and ongoing risk management are also essential.

How does Act CXII relate to the GDPR and other European data protection laws?

Act CXII aligns closely with the GDPR and other EU data protection principles, often supplementing or specifying national rules for compliance within Hungary. Organizations subject to GDPR must also comply with local requirements mandated by Act CXII.

What are the ongoing obligations for organizations under Act CXII?

Ongoing obligations include maintaining up-to-date risk assessments, continuous monitoring of security controls, prompt notification of data breaches, regular staff training, and keeping records demonstrating compliance. Organizations should also be prepared for audits by the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

How would SmartSuite support Hungary Information Self-Determination and Freedom of Information Act (Act CXII of 2011)?

SmartSuite helps organizations manage Act CXII compliance by mapping regulatory requirements to control libraries, tracking privacy and security risks, collecting audit evidence, and enabling centralized policy and documentation management. The platform supports readiness for regulatory audits through workflow-driven remediation and provides reporting dashboards for oversight and demonstration of ongoing compliance.

License included / downloadable: Yes Hungary's Information Self-Determination and Freedom of Information Act is publicly available through official Hungarian government legal resources.

Full framework page and mappings: smartsuite.com/frameworks/hungary-information-self-determination-and-freedom-of-information-act-act-cxii-of-2011