SmartSuite

Framework / Privacy / Global Privacy Regulations

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

Hungary's Act CXII of 2011 (Infotv.) sets national data protection and freedom of information rules, supplements the GDPR and is supervised by NAIH.



What it is

Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, known in Hungary as the Infotv., is Hungary's national data protection and freedom of information statute. It covers all processing of personal data, data of public interest and data accessible on public interest grounds, and it has been in force since 1 January 2012.

The National Assembly adopted the Act on 11 July 2011 and promulgated it on 26 July 2011. The National Authority for Data Protection and Freedom of Information (NAIH) supervises it (Chapter V, section 38). Act XXXVIII of 2018, in force since 26 July 2018, aligned it with the GDPR: for processing within the GDPR's scope the GDPR applies with the supplements listed in section 2(2), and the Act itself governs personal data processed for law enforcement, national security and defense (section 2(3)).

At a glance

PUBLISHER Hungarian National Assembly (Országgyűlés); supervised by the National Authority for Data Protection and Freedom of Information (NAIH)	TYPE Regulation	VERSION Act CXII of 2011, as amended (Act XXXVIII of 2018 GDPR alignment; consolidated text of 1 October 2026)
EFFECTIVE January 1, 2012	DOMAIN Privacy	FAMILY Global Privacy Regulations
REGION Hungary	ADOPTION MODEL Regulatory Compliance	IMPLEMENTATION COMPLEXITY High

Source: njt.jog.gov.hu/jogszabaly/2011-112-00-00

Why it matters

- **The GDPR is supplemented, not replaced** Section 2(2) lists the Hungarian provisions that supplement the GDPR, including the rules on NAIH procedures, the rights chapter and the controller obligations.
- **Public bodies have a 15-day clock** A request for data of public interest must be met as soon as possible and within 15 days, with one 15-day extension for large requests (section 29(1) and (2)).
- **Refusals must be explained and recorded** A refusal needs written reasons and the available remedies within 15 days, and the body keeps a register of refused requests (section 30(3)).
- **The courts can review refusals** The requester can sue within 30 days, and the body must prove the refusal was lawful (section 31(2) and (3)).

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How SmartSuite supports Act CXII/2011 (Hungary)

Processing Register with Legal Basis

Record each processing activity with its section 5(1) ground or GDPR basis, purpose, data categories and owner (sections 4 and 5).

Mandatory Processing Review Calendar

Schedule the three-year review of mandatory processing without a fixed duration (section 5(5)) and capture each outcome.

Data Subject Request Tracker

Log requests for access, rectification, restriction and erasure against the 25-day decision limit in section 15(1)(b), with decisions and an audit trail.

Public Data Request Tracker

Track requests for data of public interest against the 15-day clock, the single extension and refusal reasons, including the register of refused requests (sections 29 and 30).

Publication Lists and Transparency Evidence

Keep the electronic publication lists and evidence that mandatory public data stays published (sections 33 and 37), ready for NAIH's checks (section 71/D).

NAIH Case File

Hold investigation notices (section 52), data protection authority procedures (section 60), the 150-day limit and any fine or order (section 61) in one case record.

Common framework mappings

APEC PF | Convention 108+ | GDPR | ISO 27001:2022 | ISO 27701 | ISO 29100 | NIST Privacy Framework v1.0

Official resources

Act CXII of 2011: official English translation (as in force 1 March 2024)

The Ministry of Justice's English translation of the Act in the National Legislation Database, for information only.

njt.jog.gov.hu/jogszabaly/en/2011-112-00-00

NAIH data protection cases and guidelines

The authority's English-language list of data protection cases, guidelines and notices.

naih.hu/data-protection/decisions

NAIH Mandatory DPIA List (GDPR Art. 35(4))

The Hungarian authority's list of processing operations that require a data protection impact assessment.

naih.hu/data-protection/gdpr-35-4-mandatory-dpia-list

Frequently asked questions

Does Act CXII of 2011 still apply now that the GDPR exists?

Yes. For processing within the GDPR's scope, the GDPR applies supplemented by the provisions listed in section 2(2) of the Act. The Act itself applies to personal data processed for law enforcement, national security and defense (section 2(3)), and in full to freedom of information.

Who supervises the Act and how long do NAIH proceedings take?

The National Authority for Data Protection and Freedom of Information (NAIH) supervises it (section 38). A data protection authority procedure, opened on the data subject's request or on NAIH's own motion (section 60), has a 150-day time limit (section 60/A(1)).

How fast must a public body answer a request for public data?

As soon as possible and within 15 days of receiving the request (section 29(1)). The deadline can be extended once by 15 days for large requests (section 29(2)). A refusal must be notified in writing within 15 days with reasons and remedies (section 30(3)), and the requester can sue within 30 days (section 31(3)).

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What fines can NAIH impose under the Act?

Section 61(4) sets fines from HUF 100,000 to HUF 20 million for processing under section 2(3), meaning law enforcement, national security and defense purposes, and for budgetary bodies fined under GDPR Article 83. NAIH weighs the number of people affected, the gravity and fault, and any earlier infringement (section 61(5)).

When did the Act enter into force, and was it amended for the GDPR?

The National Assembly adopted it on 11 July 2011 and it was promulgated on 26 July 2011. Most provisions entered into force on 1 January 2012 (section 73). Act XXXVIII of 2018, in force on 26 July 2018, adapted it to the GDPR.

License included / downloadable: Yes The Act is public legislation in the Hungarian National Legislation Database, with an official English translation (as in force on 1 March 2024) for information only. The text is included with the platform for reference.

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

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