

POLITICALLY EXPOSED PERSONS AND THE RIGHT TO PRIVACY¹

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INTRODUCTION

After listing the nominated rights relating to personality, the Civil Code of 2013 deals with the situation when the *rights relating to personality of a politically exposed person is violated*. In European legal systems it is commonly accepted that one of the consequences of social engagement is the *lower level of legal protection*. The regulation of the domestic civil law also follows this principle. Therefore, exercising the fundamental rights relating to the free debate of public affairs may diminish the protection of the personality rights of politically exposed persons, to the extent necessary and proportionate, without prejudice to human dignity². A politically exposed person must always tolerate more attack of his personality than an ordinary citizen. However, the status of public actors only *narrows the protection of rights relating to personality related to public appearance but does not exclude* the possibility to enforce a claim. For example, a public person can also claim for the violation of his rights relating to personality if the unauthorized disclosure of photographs previously unrecognized by the person whose personality rights are claimed to be violated and the publication of comments violating his human dignity³.

1. The definition of the politically exposed persons

The *concept of the public actor* is vague and indefinable, which is also caused and enhanced by the fact that public persons do not form a homogeneous group. Some them *undertake this role with their own choice* while there are others who *unintentionally* get into this position (e.g. because of their birth). Some people are *involved in the social decision-making processes*, but there are also persons who do not get into such a situation, but because of their *social involvement*, they shape the personality of the members of the sociality (especially those of the young

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² Section 2:44 of the Civil Code.

³ BDT2014. 3130.

people), influence their value system and they follow them as an example (e.g. performers, models, television personalities)⁴. According to Levente Tattay, people are considered to be public persons who take public publicity or have a significant influence on the development of the public life⁵. According to another concept of Levente Tattay, that public actors are natural or legal persons who influence the life of the narrow or broad society with their activity and public action, or who are involved in the public questions⁶.

The so-called „*Agent Act*” contains the following definition relating to the *public actors*: *public actor* is a person who exercise or have exercised public authority, who was nominated for a post of public authority, or who is or was responsible for the shaping of the political public opinion⁷.

According to the provisions of another act⁸, *politically exposed person* means a natural person who is entrusted with prominent public functions, or who has been entrusted with prominent public functions within one year before the implementation of customer due diligence measures. In Hungary, natural person who has been entrusted with prominent public functions include e.g. the head of State, the Prime Minister, ministers and state secretaries, members of parliament and spokesmen for the nationality, members of the Constitutional Court, of the courts of appeal and the Curia etc.

The provisions relating to the politically exposed person has to be applied to their *family members* and to *other persons known to be close associates of politically exposed persons* as well⁹.

The concept of the public persons in civil law is therefore unclear. The question *whether a person can be regarded as a politically exposed person* usually cannot be answered based on the position, the official position, public status or the wider public fame of the person, but on the legally relevant concrete life situation¹⁰. A public actor is a person who appears before the public with the intention of the public appearance. A person who works in a public place cannot be considered as a public

⁴ Menyhárd Attila (2014): *A magánélethez való jog elméleti alapjai*. In *Medias Res* 2014/2. 398.

⁵ Tattay Levente (2007): *A közszereplők személyiségi jogai*. Budapest-Pécs, Dialóg Campus, 2007. 19.

⁶ Tattay Levente (2006): *A közszereplők magánjogi személyiségvédelme*. Magyar Jog 2006/4. 229.

⁷ Point 13 of Section 1 of Act III of 2013 on the exploration of activities of the secret services of the past system and on the establishment of the Historical Archives of the State Security Services.

⁸ Subsection 2 of Section 4 of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing.

⁹ Subsection 5 of Section 4 of Act LIII of 2017.

¹⁰ BDT2011. 2420.

actor in the absence of the intent of the public appearance¹¹. In the case, in which both the plaintiff and the defendant were engaged in political activity, expressed their views on public affairs of public interest with public disclosure, and the announcements relating to the claim and the counterclaim arose in connection with their public activities, the *special rules relating to the politically exposed persons* had to be applied to both of them. It was irrelevant in itself that only the plaintiff was the representative of the local government of Y City, since the public participation cannot be narrowed down to political positions¹².

In connection with the public persons, “not the national recognition is important but the fact that any event related to the live of the person concerned have significance or newsworthiness for other people outside of the closest acquaintance”. Politicians, actors, writers and models have chosen a job, which necessarily involves a life of great interest. The protection of rights relating to personality of a politically exposed person can be limited by the very fact that, in most cases, he finds himself in the centre of attention by his own decision¹³.

2. Different tolerance threshold in connection with the express of opinion

In case of *infringements of the freedom of expression*, the tolerance threshold is much higher in case of infringement of opinions in connection with the state, public bodies, and statements of the persons representing the public authorities, than in connection with other legal entities¹⁴. The public criticism of the activities of the bodies and persons performing tasks in the state and local government is a prominent constitutional interest. The protection of rights relating to personality is therefore not based on the value judgments that come to the conflict of public opinion, even if they are excessive and exaggerated¹⁵.

In the civil law protection of rights relating to personality, there isn't any compass that could help the lawyer to set up a standard for the violation of the rights relating to personality of public persons. For example, when it was stated that the plaintiff, who is an officer of a trade union and a candidate

¹¹ BDT1999. 4.

¹² Court of Appeal of Debrecen Pfl.20.047/2016/7.

¹³ FÉZER Tamás (2014): *Személyiségi jogok*. In: Osztoivits András (ed.): A Polgári Törvénykönyvről szóló 2013. évi V. törvény és a kapcsolódó jogszabályok nagykommentárja I. kötet, Budapest, Opten Informatikai Kft. 277.

¹⁴ FÉZER 2014 275.

¹⁵ BDT2004. 1038.

of representative of the local government, is “a miserable figure of the political game” and a “puppet in the hands of the parties”, the mere – even powerful – criticism cannot establish the protection of rights relating to personality in the absence of an unjustifiably insulting expression¹⁶. In another case, the Supreme Court ruled in principle that the unfavourable expression of public opinion or value judgment relating to politically exposed person does not in itself justify the protection of rights relating to personality even if it reflects *exaggerated or heightened emotions*. Politically exposed persons have to count with the fact that their political opponents (especially during the election period) criticize their activities, their appearance and that they inform the public about it. Politically exposed persons must also bear the opinions and criticisms that shows their personality in negative colours and negatively evaluate their activity¹⁷. Therefore, the expression and value judgement of a public actor who criticize the activity of another public actor does not in itself justify the protection of rights relating to personality¹⁸. However, if it has to be decided whether the expression of an opinion or comment involves an increased tolerance by the person concerned, it is of primary importance whether the statement challenged was in connection with the dispute over public affairs¹⁹.

During political campaign period, in connection with a *political opinion* of a politician of a party which was made during a press conference related to the purity of the electoral process, not only value judgements in connection with public affairs but statements relating to public affairs also enjoy enhanced protection²⁰. It cannot be argued, however, that if someone states – without any basis, in the knowledge of the facts – that another person have committed a criminal offence, this statement has an offending content, which provides the basis for the adjudication of an infringement even in the case of a public person. This is not excluded by Section 2:44 of the Civil Code either²¹. The measure of defamation against public actors – in the case of opinions – is the “disproportionate exaggeration” or the “unjustified harm”. It is without doubt that the private life of a public person may be the subject of press articles because this is an integral part of the increased obligation of tolerance. However,

¹⁶ BH2001. 522.

¹⁷ BH2004. 104.

¹⁸ BH2001. 522.

¹⁹ BDT2017. 3776.

²⁰ BDT2018. 3795.

²¹ Curia Pfv.IV.21.207/2016/4.

the *secrets of the most intimate private life* should not be part of everyday public debate even in the case of a public actors²².

3. The protection of facial likeness and recorded voice in case of politically exposed persons

As a general rule, the *consent of the person affected* shall be required for producing, using or disclosing his/her likeness or recorded voice.²³ An exception from this rule – among others – is if the recording was made in a *public event*²⁴. If someone appears in public places, walks on the street, rests in a spa, watches a movie, visits an exhibition, or attends a sport match, he does not do any public performance, he just has fun as a private person. However, the public performance, speech, presentation etc. of the public person (e.g. politicians, actors, spokespersons) can be regarded as a public appearance. A person taking active part in a public event, meeting or assembly is considered as a public actor²⁵. Therefore, a public actor is a person who appears before the public with the intention of the public appearance. However, a person who works in a public place cannot be considered as a public actor in the absence of the intention of the public appearance²⁶. However, the audience of the public performance cannot be regarded as public person in any way.

However, a *lawyer* representing a state body cannot be considered as a public authority or a public actor during the *public hearing of a civil lawsuit*, his activity cannot be regarded as a public activity. In the civil lawsuit, the public authority is exercised by the court; in the exercise of their procedural rights the representatives of the parties are not acting for the public interest, but for the interests of the represented party. Therefore, their *consent is required for producing their likeness or recorded voice during the public trial*²⁷.

²² Court of Appeal of the Capital 17.Pf.20.706/2016/3-II.

²³ Nowadays, the use of facial likeness with the consent of the person for advertising purposes has become a complete industry. We can see almost every day advertisements with the images of famous athletes, actors or media icons. The detailed rules of business image transfer – so-called merchandising contract – can be found in commercial law and in marketing.

²⁴ Subsection 2 of Section 2:48 of the Civil Code.

²⁵ SZEGHALMI Veronika: A képmás polgári jogi védelme és a hazai szabályozás alapvonalainak áttekintése európai példákon át. http://www.mediakutato.hu/cikk/2014_01_tavas/04_kepmas_ptk_europa.pdf (date of download: 2018. 08.10.) 56.

²⁶ BDT1999. 4.

²⁷ BDT2016. 3441.

According to the uniform judicial practice based on the regulation of the Civil Code related to the public appearance, the likeness of a politically exposed person can only be used *in relation to his public appearances*, in the framework of his public manifestations without his consent. *The likeness of the public actor is therefore not subject to free usage*²⁸. For the purpose of making a likeness or recorded voice, the *conditions for public appearance are met* if the recording is made on a public event where it is ordinary to make a film and television recordings, i.e. the person who takes part in the event, must count with the fact that his personally is – recognizably – recorded. Appearance in a record in a police cell cannot be regarded as a public appearance, therefore the consent of the person concerned is required for the publication their likeness or recorded voice during the public trial not a public act, so the consent of the person concerned is required to disclose the recording²⁹. The press conference of a chief police officer is considered as a *public appearance*. Therefore, the rights relating to personality are not violated if his image is published as an attachment to the newspaper article without his consent³⁰. In connection with the attendant of a public actor, a broader interpretation can be read in a judgment of the Curia, according to which if someone takes part in an event funded by public finances as the companion of a public person, he/she has to expect that the press will report it, even using his/her image. In such cases, the right to freedom of the press (freedom of expression) has to be compared with the enforcement of the right of the individuals to the protection of his/her image³¹.

The public position or the political role naturally turns the attention of readers to the private life of the politically exposed persons, therefore the media service providers often increase the number of their viewers and readers not only by disclosing recordings of their public appearances. It raises the question how it is legitimate to disclose recordings of certain events of the private life of a public actor without his consent. As a general rule, the behavior and the acts of the politically exposed persons *cannot be regarded as part of the inviolable private life* – regarding their potential impact on society, their role in the political and social life, and the interest of the public to be informed. On the hand, however, a public person may

²⁸ BH2006. 282.

²⁹ BDT2007. 1663.

³⁰ BDT2006. 1298.

³¹ BH2017.86.

also rightly claim for the respect of his right to privacy. Where does this boundary lie?

4. The protection of the right relating to personality of the public figures

The Civil Code adopted in 2013 did not only give exemption for the consent of the public persons in case of likeness or recorded voice, but it declared the protection of the rights relating to personality of the public actor as follows: “exercising the fundamental rights relating to the free debate of public affairs may *diminish the protection of the personality rights of politically exposed persons*, to the extent necessary and proportionate, without prejudice to human dignity”³². However, the Act only provides this opportunity under certain conditions.

(a) One these conditions, which is still existing, is that the limitation of the right relating to personality of a public person can only be occurred for the *exercise of the fundamental rights of the discussion of public affairs*, e.g. parliamentary speech, public debate. This wording has also indicated that the satisfaction of the curiosity of the society is not a sufficient basis for the intervention in the private life, even in case of a person taking part in the social decision-making. It is important to treat the public appearance and the private life of a politically exposed person separately, because the public actor is equally entitled to the right to privacy as a private individual. The levels of the protection of the rights relating to personality are separated only in case of the public participation. Disclosure of a record taken from a public actor may therefore diminish the right to likeness defended by the act only *to the extent necessary and proportionate to the discussion of public affairs*. The consent of the person concerned is required to publish a photograph of a well-known person which was not taken in a life situation requiring public interest. In the absence of this, the recording made and published violate the personality right to image of the person concerned³³.

If the legal protection of the politically exposed persons wants to be assessed, the case law of the European Court of Human Rights (ECtHR) also has to be analysed. Regarding the fact that Hungary is a State Party to the European Convention on Human Rights, it is important to enforce the criteria of the ECtHR elaborated during the interpretation of the Convention as the minimum requirements of legal protection when

³² Section 2:44 of the Civil Code – text effective on the 15th March 2014.

³³ BDT2017. 3693.

elaborating Hungarian constitutional standards³⁴. The ECtHR lied downed the general aspect of the publication of likeness in the press in the *so-called Hannover-cases*.³⁵ These are the following³⁶:

– How does the photo and the article contribute to a public debate? It is a key issue whether the particular article contributes to the social debate in a particular topic, or its sole intention is the satisfaction of the curiosity of the public. In the latter case, the right to privacy obviously deserves more severe protection³⁷.

– How well-known is the person concerned and what is the subject of the communication³⁸?

What was the previous behaviour of the person concerned against the press?

³⁴ See in details: SZÉKELY László: A cselekvőképesség. In: Kommentár a Polgári Törvénykönyvhöz. (ed. Vékás Lajos-Gárdos Péter) Wolters Kluwer, Budapest, 2014. [SZÉKELY 2014./2.] 132–134.

³⁵ The complainant of these cases was Caroline von Hannover, the Princess of Monaco, the member of the Royal Family of Monaco, who usually represents the family in social events. The common feature of all three cases is that Caroline von Hannover opened a procedure before the competent German courts. In these proceedings she requested the court to prohibit the press from publishing the photographs taken about her. However, the German courts found her applications unfounded with regard some photographs. Caroline von Hannover thought these decisions are contrary to the European Convention on Human Rights and complained to the ECtHR. Boronkay Miklós (2014): *A képmáshoz és hangfelvételhez fűződő jog*. In: A személyiség és a média a polgári és a büntetőjogban. Az új Polgári Törvénykönyvre és az új Büntető Törvénykönyvre tekintettel. (ed. Csehi Zoltán-Koltay András-Navratyil Zoltán), Budapest, Complex Press. 37–44.

³⁶ http://nmhh.hu/cikk/192476/LilloStenberg_v_Norway_avagy_a_Strasbourgi_Birosag_hatasa_a_nemzeti_jogalkalmazásra (date of download: 2018.08.10).

³⁷ In the second case before the ECtHR (40660/08. and 60641/08.) was emerged because of three articles and pictures. The first picture was about Caroline von Hannover, Princess of Monaco, and her late father, Duke Rainer, as they walk past each other. The main topic of the article was the Duke's medical condition and his illness. The case went to the German Federal Constitutional Court, where the court stated, in line with the federal court, that the two articles and photos about the holiday of the family did not contribute to public debate of public affairs in any way. But, the first article dealt with the poor health of the monarch and this situation was illustrated by the photograph too, which can be a matter of public interest. So, contrary to the pictures of their winter vacation, in this case, the rights relating to personality shall be overshadowed by the right of expression of the press and the right to public information. From the latest decisions of the European Courts of Human Rights. In: *Fundamentum* 2012./3.118. http://epa.oszk.hu/02300/02334/00049/pdf/EPA02334_Fundamentum_2012_03_115-123.pdf (date of download: 2018.08.10).

³⁸ On 3rd May, 2005 a woman sad to the Daily Mail, that his son's father is Prince Albert II of Monaco. After this, another article was released in the Paris Match with the same topic, in which there were some pictures about the Prince with his son in the arm. According to the Court, the topic of the article touched the private life of the Prince, but the further information was beyond the private life, because the function of the prince, the head of state of Monaco, is inherited. From the latest decisions of the European Courts of Human Rights. In: *Fundamentum* 2016./1. 119. http://epa.oszk.hu/02300/02334/00070/pdf/EPA02334_fundamentum_2016_01_115-131.pdf (date of download: 2018.08.10).

What form and content has the article appeared³⁹?

During which circumstances was the photograph taken (with or without the consent of the person concerned)?

The information obligation of the press does not create additional rights; linear media service providers are also obliged to comply with the law in fulfilling this obligation, and their activity – as a general rule – cannot harm the rights relating to personality of other persons. If the likeness or voice of a public actor is recorded in a public place without his or her consent, the *collision between the freedom of expression and the protection of rights relating to personality has to be resolved by balancing the interests* even if the communication contributes to the presentation of a matter of public interest. The use of a record taken with a hidden camera violates the right to likeness or recorded voice of the politically exposed person, if the recordings do not contribute to the presentation of a matter of public interest, and if it does not have any information to promote it⁴⁰.

b) The *right to human dignity* of a public actor must also be respected by the infringer even if his or her rights relating to personality are restricted. Therefore, it is without doubt that the public status simply narrows down the protection of rights relating to personality, but does not exclude the possibility of enforcing the claim, in particular in case of comments of pictures published by the press organs which violate human dignity⁴¹.

c) Finally, it is also an important condition that the rights relating to personality of a public figure can only be diminished *to the extent necessary and proportionate*. This means that statements concerning the integrity and reputation of a public actor cannot be turned into personality, which means that they cannot aim solely to the humiliation, abasement and degradation of the person concerned.

According to the original text of the Civil Code, the rights relating to personality of politically exposed persons can only be limited by “*reasonable public interest*”. However, this text was annulled by the Constitutional Court.

³⁹ In Norway, a local magazine published a two-page article about a couple of famous musician’s wedding, which was illustrated by several photographs. These photos are taken approximately 250 meters from the event. In the photographs the bride is shown when she arrives with her dad and others on a boat to the island which is the place of the wedding. According to the decision of the ECtHR, it is true that weddings belong to private life, but this one was public figures’ wedding, so it was matter of public interest. The article did not contain any criticism, did not report a negative assessment for the affected pair, and did not contain the moments of wedding ceremony. Furthermore, the island, which was the place of the wedding, is an open place to the public, so the ECtHR did not judge harmful the pictures. http://nmhh.hu/cikk/192476/LilloStenberg_v_Norway_avagy_a_Strasbourgi_Birosagi_hatas_a_nemzeti_jogalkalmazasra (date of download: 10.08.2018).

⁴⁰ BDT2017. 3760.

⁴¹ BDT2014. 3130.

According to its reasoning, the dispute of public affairs is in itself a public interest which can be a limit of rights relating to personality of persons exercising public power, therefore imposing a further public interest in that regard would disproportionately constrain the freedom of the press⁴².

The provisions entered into force on the 15th March 2014 declared the possibility of limitation of the rights relating to personality of public persons, but its limits were the necessary and proportionate extent of the exercise the fundamental rights relating to the free debate of public affairs and the respect of human dignity according to the Code. However, it was the judicial practice which elaborated the extent how the information and images belonging to the private life of public figures may be disclosed for the exercise of the fundamental rights ensuring the free dispute in public affairs.

5. The declaration of the right to private life of politically exposed persons

In the recent years, the international and domestic judicial practice has increasingly confronted the possibility of limitation of the rights relating to personality of politically exposed persons with the requirement of the *inviolability of their private lives*. The ECtHR has also dealt several times with the conflict between the right to respect for private and family life enshrined in Article 8 and the freedom of expression described in Article 10 of the European Convention on Human Rights⁴³. It is the responsibility of the journalists to respect the rights of privacy of individuals, including public actors as well, for which they must take into account prior to the publication the expected impact of the information and images they wish to communicate, and to consider what information are *rightly subject of public interest*.

This is also a question of the domestic judicial practice, which is proven by a recent decision-making decision. A politically exposed person was prosecuted for the commission of truculence, and the court hearing has caused great press interest in 2017. In this context, a web site operator published an article on the day after the hearing. According to the article, the plaintiff told at the court hearing he was horribly overwhelmed because of the 72-hour custody but after an hour of his release, he was already looking for a party on the internet. The article explained that according to the Wikipedia the website planetromeo.com is an international dating site for homosexual, bisexual and transgender men. After the release

⁴² Decree 7/2014. (III. 7.) of the Constitutional Court.

⁴³ Application No. 40454/07; Application No. 39954/08; Application No. 40660/08. and Application No. 60641/08.

of the articles, the applicant received a number of vulgar messages on his Messenger site and most of them referred to his alleged gender identity. In this case, the Court of Appeal of the Capital stated, that the protection of right to privacy of politically exposed person can be restricted only *in the event of an overriding public interest* and in the case, *if the interference is related to the person's public appearance, his advertised ideas, and his actions, statements, which aiming at the formulation of public life*.

Denial of a statement in relation to an insignificant moment of a public event is not a sufficient reason for the press to show the affairs of the most intimate private life of a public figure: exercise the right to freedom of press such in a way is not proportionate to the harm of personal right of privacy of the public figure⁴⁴.

The first section of the Article VI. of the Fundamental Law, which was supplemented by the seventh amendment of it, declared that freedom of expression and the right of assembly cannot cause the harm of others' right to private- and family life, and of home with the effect of 29th June, 2018. The second section declares, as a new rule, that the state protects the calm of home by legal instruments.

There is a whole new act on the protection of private life since 1st August, 2018⁴⁵. According to the preamble of the Act, the right to private life, family life, home and contact are deriving from the innate dignity of human. The right to private life is vital to the fulfilment of human being and self-identity, because it defines the untouchable province of personality. The Act emphasises that everyone is entitled by the right to privacy (private life) and it shall be respected during the discussion of public affairs as well, so discussion of public affairs cannot cause the harm of right to private and family life and of home. In line with the Fundamental Law, politically exposed persons are also entitled by the right of private and family life and of home.

The private and family life of the politically exposed person and his/her home is protected by the same protection as the person who is not a public figure⁴⁶. The right to respect of private life can be violated by the misuse of the personal life data, secret, facial likeness, recorded voice or the harm of honour and reputation⁴⁷.

In order to create consistency with the Article VI. of the Fundamental Law, the Article 2:44. of the Civil Code, which is relating to public figures, shall be

⁴⁴ BDT2018. 3847.

⁴⁵ Act LIII. of 2018. on the protection of private life (Ppl.).

⁴⁶ Section 2 of Article 7 of Ppl.

⁴⁷ Section 2 of Article 8 of Ppl.

amended. According to the new rules, exercising of fundamental rights relating to the free debate of public affairs may diminish the protection of the personality rights of politically exposed persons, to the extent necessary and proportionate, without causing any harm to human dignity. *However, it may not breach the right to respect for his or her private and family life, and home.* It is also important, that *public figures are entitled the same rights and protection as the non-public figures* in case of the behaviour or dispute is outside of the public affairs. Furthermore, an activity or data related to the private or family life of a public figure is not the subject matter of public affairs.

The new legislation carries a very strict message: if the disclosure of an activity or data relating to the private and family life of a public figure can never be classified as a public affair, then in this respect, the public figure is entitled by the same protection as the non-public figure. Namely, (s)he is not obliged to endure bit more than an ordinary person in these cases, even though (s)he is a public figure and (s)he is given so much personal attention by the society than an ordinary person. The strict regulation of the law seems to be contrary to the ECtHR's interpretation. According to the ECtHR, a person, who takes part in public life must know that events of his private life may also be the matter of public interest and therefore the press is entitled to deal with, of course within certain limit, these events and moments. The new Hungarian legislation excluded the application of assessment criteria defined by the ECtHR in relation to the conflict between the freedom of expression and the integrity of privacy, by stating that the disclosure of activity and data within the scope of privacy is unlawful without the consent of the certain party, even in the case of public figures. So, there are no other solutions for courts, then the "*much more strict definition*", *interpretation* of whether the misuse of personal data, secret, facial likeness, recorded voice, or violation of honour and reputation can be regarded the violation of rights of private life. Strengthening the latter conceptualization can only mean the, relatively broader, interpretation of the freedom of expression in line with the ECtHR and one of the possible instrument for approaching the previous judicial practice.

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