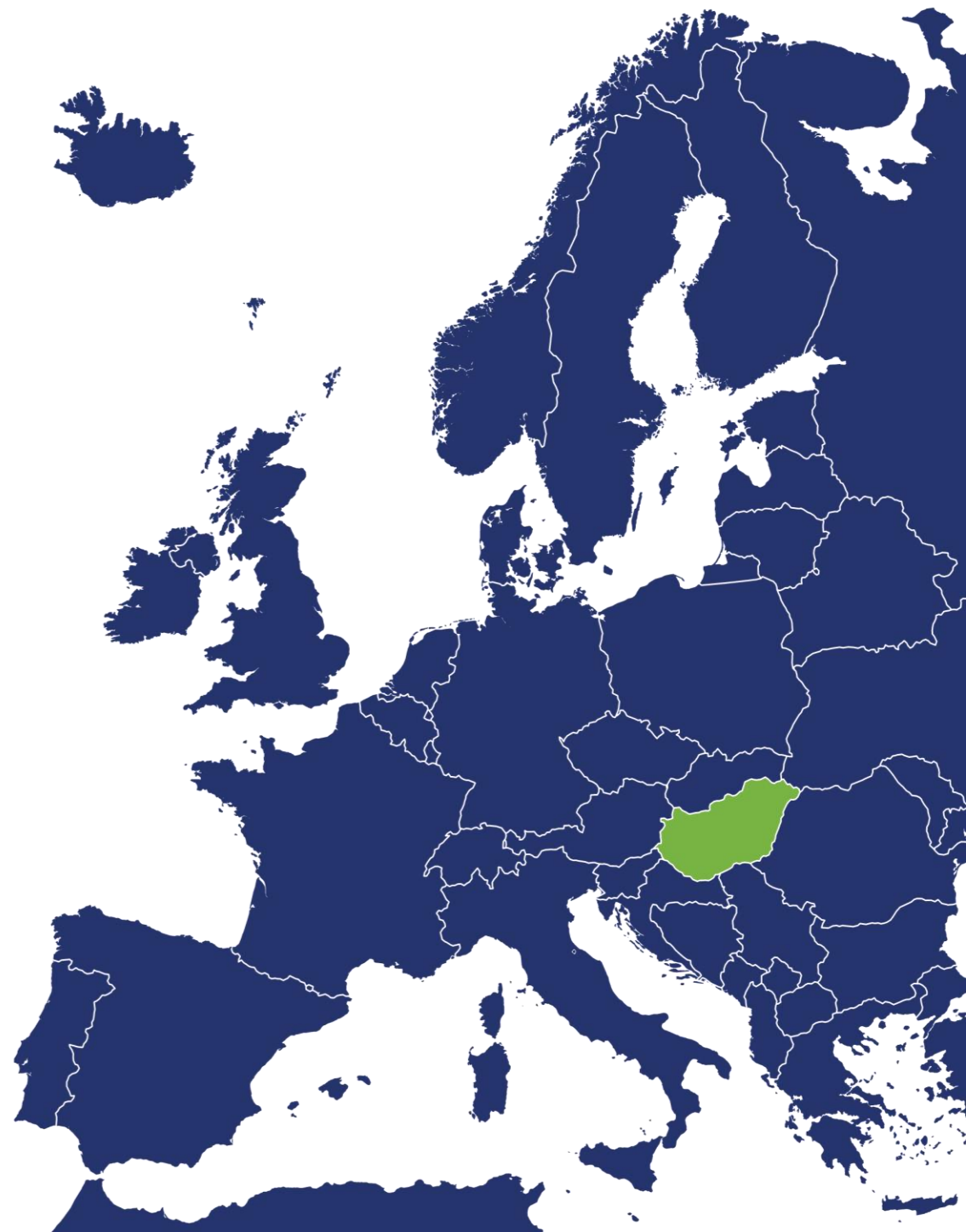


NIS2 across the EU

Hungary

As NIS2 is implemented across the EU, we are tracking the key features and important differences arising under local legislation.

In the first of our local country updates, we look at Hungary.



The Legislation

- The Cybersecurity Act (XXIII of 2023) is already in force, with further decrees setting out more detailed requirements expected to come into force soon.
- Crucially, the deadline for registration passed on 30 June 2024.
- From 18 October 2024, penalties will apply for failure to register of up to €375,000 compared to €37,500 for late registration.

Liability & Enforcement

- The upper management of in-scope entities will be liable for NIS2 compliance in line with the existing Hungarian civil and criminal regime.
- Upper management responsibilities include:
 - Defining the role of the person responsible for cybersecurity.
 - Determining the rules applicable to users of electronic information systems.
 - Ensuring regular infosec training and maintenance of knowledge levels.
 - Flow-down of cybersecurity obligations to suppliers.

Registration and Main Establishment

- Hungary did not implement the main establishment principle. This is at odds with the approach set out in NIS2, and could come as a surprise to many businesses.
- As a result, all providers of digital infrastructure (including cloud providers), B2B ICT service management and digital providers providing services that are in scope of NIS2 and providing services in Hungary will need to register in Hungary and comply with the Hungarian Cybersecurity Act.

Infosec Requirements

- The incoming Annex II of MK Decree 7/2024 (VI. 24) sets out the detailed cybersecurity risk management measures.
- These are based on NIST 800-53 rev. 5. Unlike the draft Commission Implementing Regulation, MK Decree 7/2024 applies to all entities in scope of NIS2 in Hungary and sets out more detailed requirements.

Contacts

Get in touch with our experts if you have any queries or need support complying with NIS2 in Hungary or across the EU.

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Further updates

→ For further updates on NIS2 across the EU and a list of our international contacts:



→ You may need to download this as a PDF first.