

## PRIVACY POLICY

April 22, 2022

**THE LAJOS BATTHYÁNY FOUNDATION** (hereinafter: **The Foundation** or **data controller**) publishes the following Data Protection information to inform those concerned.

<b>Name of data controller:</b>	LAJOS BATTHYÁNY FOUNDATION
<b>Additional organization:</b>	DANUBE INSTITUTE
<b>Headquarters:</b>	1067 Budapest, Eötvös u. 24. I./16.
<b>Office:</b>	1015 Budapest, Csónak u. 1.
<b>Company registration number:</b>	13.PK.66.895/1991
<b>Tax number:</b>	19671365-2-42
<b>Phone:</b>	+36 1 332-5305, 269-4099
<b>E-mail:</b>	info@bla.hu

Name and contact information of the data protection officer

Name: Jenő Széll (QUALIMADE Bt.)

Contact: [adatvedelem@bla.hu](mailto:adatvedelem@bla.hu)

Basic principles of data management

Personal data:

- are handled legally and fairly by the BATTHYÁNY LAJOS ALAPÍTVÁNY, and it conducts them in a transparent manner for the person concerned ("legality, fair procedure and transparency");
- are collected only for specific, clear and legal purposes, and those are not managed by The Foundation in a way that is incompatible with these goals; ("to purpose constraint");
- must be appropriate and relevant for the purposes of data management, and they must be limited to what is necessary ("data sparing");
- their management must be accurate and, if necessary, up-to-date; all reasonable measures must be taken to ensure that, from the point of view of the purposes of data management, inaccurate personal data to be corrected or deleted immediately ("accuracy");
- its storage must take place in a form that allows the identification of the affected parties only and enables the processing of personal data for the time necessary to achieve its goals; ("storage limitation");
- are to be handled in such a way that appropriate technical or organizational measures must be taken, adequate security of personal data can be ensured by using the data, unauthorized or illegal handling, accidental loss or destruction or its protection against damage ("integrity and confidentiality").

## Security of data management

Protection of personal data during the operation of the data controller rest on

- physical,
- logical and
- administrative

pillars. Selection of the IT tools used during the service and is operated in such a way that the managed data

- are accessible to those authorized to do so (availability);
- their authenticity and authentication are ensured (authenticity of data management);
- their immutability can be verified (data integrity);
- be protected against unauthorized access (data confidentiality).

What the Foundation preserves during data management

- confidentiality: it protects the information so that only those who are authorized to do so can access them;
- integrity: protects the accuracy of the information and the method of processing and completeness;
- availability: ensures that when the authorized user needs it, he/she can really access the information they want and have related devices available.

The IT system and network of the Foundation and its partners are both protected against computer-aided fraud, espionage, sabotage, vandalism, fire and flood, computer viruses, computer hacking and denial of service attacks. LAJOS BATTYÁNY FOUNDATION provides server level and application-level protection procedures. We inform our users that electronic messages transmitted on the Internet, regardless of protocol (e-mail, web, ftp, etc.) are vulnerable to such network threats against which are unfair activities, contract disputes, or information lead to its disclosure and its modification. The service provider must be protected from such threats and must take all the precautions expected of him. Monitors systems in order to be able to record all IT incidents and provide evidence regarding them. System monitoring also enables checking the effectiveness of the applied precautions.

## Data management at the Foundation

Data management not detailed in the list below is the Foundation's internal data management processes, which are discussed in more detail in the Data Protection Regulations, in a form which complies with the rules.

### 1. Data management related to the creation of the employment relationship

**Purpose of data management:** suitable candidates to fill vacant and/or created positions, selection of employees, management of applicants' personal data.

**Scope of processed data:** name, telephone number, e-mail address, personal data provided by the applicant in the CV.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a), "consent of the data subject". **The deadline for data storage:** until the job is filled or until the data subject requests deletion.

An exception to this is personal data obtained from the Profession.hu website, which the Employer is obliged to delete after filling the position, but no later than on the 90th day after the documents have been downloaded.

2. Data management related to registration on the website of the Foundation

**The purpose of data management:** to ensure the access of the data subject to the Foundation's event, tracking the number of applicants.

**Scope of processed data:** name, e-mail address.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a), "consent of the data subject".

**The deadline for data storage:** until the data subject's cancellation request, but no later than the end of the working day following the event, or until the costs of the event are settled. In the event of non-approval for the processing of the above personal data, the Foundation cannot guarantee the place, and therefore the entrance to the given event.

The data subject can request the deletion of his/her name and e-mail address at the e-mail address [rendezveny@bla.hu](mailto:rendezveny@bla.hu), which the Foundation fulfills within 3 working days.

3. Ongoing data management within the Doctoral Scholarship Program of the Lajos Batthyány Foundation

**The purpose of the data management:** financial support of persons at the doctoral school.

**Scope of processed data:** name of the data subject, mother's name, place and time of birth, address, tax identification number, bank account number, personal data shown in the screenshot taken from the Neptun system.

**The legal basis of the data management:** according to Article 6 (1) subsection (b) of the GDPR, data management necessary for the performance of a contract in which the data subject is one of the parties, or that contract necessary to take steps at the request of the data subject prior to its conclusion.

**The deadline for data storage:** 5 days after the fulfillment of the conditions laid down in the Scholarship Agreement. until the end of the year, until the deadline of a possible legal action.

4. Data handling conducted within the framework of the Support Program of the Lajos Batthyány Foundation

**The purpose of data management:** support of people carrying out activities consistent with the Foundation's goals or support of people who want to implement it.

**Scope of processed data:** name of the data subject, mother's name, place and time of birth, address, tax identification number, bank account number, possibly in partial reports and settlements personal data included.

**The legal basis of the data management:** according to Article 6 (1) subsection (b) of the GDPR, data management necessary for the performance of a contract in which the data subject is one of the parties, or that contract necessary to take steps at the request of the data subject prior to its conclusion;

**The deadline for data storage:** Until the end of the 5th year following the fulfillment of the conditions laid down in the Support Agreement, until the deadline for possible legal action.

5. Data management related to photos taken of the performers

**Purpose of data management:** during the operation of the Foundation, in accordance with its goals presenting the speakers of upcoming conferences, documenting the participation of the

people concerned.

**The scope of the processed data:** the image of the data subject.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a) "consent of the data subject". **Data storage deadline:** until the consent of the data subject is revoked.

In the absence of the data subject's consent, the image will not be recorded.

6. The personal data of registrants on the website of the Foundation are processed for future notification purposes

**Purpose of data management:** invitation to the Foundation's events.

**Scope of processed data:** name, e-mail address.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a), "consent of the data subject".

**Data storage deadline:** until the data subject's request for deletion.

In the event of non-approval for the processing of the above personal data, the Foundation cannot send invitations to its events.

The data subject can request the deletion of his/her name and e-mail address at the e-mail address [rendezveny@bla.hu](mailto:rendezveny@bla.hu), which the Foundation fulfills within 3 working days.

7. Data management of video and audio-visual material produced at events within the Foundation's remit

**The purpose of data management:** documentation of the foundation's events, maintaining contact, trust strengthening, expanding the range of interested parties.

**Scope of processed data:** facial image, location, behavior.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a), "consent of the data subject".

**Data storage deadline:** until the data subject's request for deletion.

The Foundation provides information to the invited guests about the making of photo, audio and video recordings, as well as the way the recordings are used. The invited receive information about the location of the "photo-free zone" and about the rights of the affected.

8. Data management related to information sent about the Foundation's events

**Purpose of data management:** promotion of the Foundation's events, giving information to interested parties.

**Scope of processed data:** name, e-mail address.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a) "consent of the data subject".

**Deadline for data storage:** until personal consent is revoked.

Those interested in the Foundation's events, having learned about the Data Management Information can give their consent to information about further events. The consent can be given in an active way. If the person concerned neither marks "Yes" nor "No" the box is not marked, the Foundation will consider it as a NOT given consent, and no further notices and information will be sent.

If someone decides to withdraw their consent, they can do so by sending an e-mail to [info@bla.hu](mailto:info@bla.hu). You can do so in an e-mail addressed to the office manager Edina Simon. After

the withdrawal of consent, the personal data of the person concerned will be deleted immediately by a staff member of the Foundation.

#### 9. Data management related to sending newsletters

**The purpose of data management:** to inform interested parties about the Foundation's news.

**Scope of processed data:** name, e-mail address.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a) "consent of the data subject".

**Deadline for data storage:** until personal consent is revoked.

The data manager only manages the personal data collected for this purpose as long as the person concerned does not unsubscribe from the newsletter list or does not give confirmation. The person concerned can unsubscribe from the newsletter at any time, the link is at the bottom of the e-mails and the cancellation request sent to the e-mail address [info@danubeinstitute.hu](mailto:info@danubeinstitute.hu) or sent by post at the following address: Danube Institute 1067, Budapest Eötvös u. 24.

#### 10. Data management related to one-time inquiries

**The purpose of data management:** to establish contact, maintain contact, and provide information.

**Scope of processed data:** name, e-mail address, text message (which may contain personal), telephone number.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a), "consent of the data subject".

**The deadline for data storage:** until information is provided, then the personal data is deleted.

#### 11. Management of contact information

**The purpose of data management:** to ensure contact with partners.

**Scope of processed data:** name, e-mail address, text message (which may contain personal data), telephone number.

**Legal basis for data management:** Article 6 (1) of the GDPR. point a) "consent of the data subject".

**The deadline for data storage:** until the end of the partnership relationship, or until the affected person's consent is withdrawn.

#### 12. Data management related to camera surveillance

**Purpose of data management:** monitoring with cameras for personal and property protection purposes and compliance with information security (according to MSZ ISO 27001 standard) and documenting its verifiability.

**The scope of processed data:** especially images of the person concerned, other images that can be obtained with the camera, (location, behavior).

**The legal basis for data management:** the legitimate interest of the organization, Article 6, Paragraph 1, Subpoint f) GDPR.

**Data storage deadline:** 7 calendar days from data collection.

The details of the data management process can be found in the Data Management Policy of the Camera Surveillance System of the Foundation and the related Data Management Information Sheets.

13. Data management related to board meetings held via electronic means of communication
14. Data management in the context of maintaining and terminating the employment relationship
15. Data management necessary to fulfill accounting obligations
16. Data management necessary to fulfill tax and contribution obligations
17. Data management related to the control of workplace devices
18. Data handling related to company events held with the participation of employees
19. Data handling related to the courses covered by the Act on Adult Education

## Data processors

On behalf of the LAJOS BATTHYÁNY FOUNDATION, the following organizations and enterprises and individual entrepreneurs (data processors) carry out data management

István Weber e.v.	accountancy,
Zita Krisztina Wéber e.v.	payroll calculation
A-Geni Kft.	auditing, financial and accounting consulting,
Sasvár-Kincs Kft.	auditing,
Mohai Law Firm	legal advisor, lawyer,
Help-Express Kft.	IT services,
Civil Rendszertechnika ésTávfelügyeleti Kft.	electronic monitoring system, maintenance of security systems
Regalis Security Kft.	security services,
QUALIMADE Tanácsadó és Szolgáltató Bt.	data protection officer, information security management trustee.

The addresses, contact details and representatives of the above contractors, businesses and law firms are in the Data Protection Policy No. 1 annex, which the Foundation can provide upon request, employees make it available to those concerned.

The Foundation only uses data processors who are suitable provide sufficient guarantees that their data management complies with the requirements of the regulation and that they have appropriate technical and organizational measures ensuring the protection of the rights of those concerned for its implementation. The Foundation states in the data processing contracts that the data processor

- personal data is handled solely on the basis of the written instructions of the data controller;
- ensures that the persons authorized to handle personal data are kept undertake a confidential obligation or are obliged confidentiality based on law;
- taking into account the nature of the data processing appropriate technical and organizational help is given to the data controller to fulfill requests related to the exercise of the rights of the data subject;

- after the completion of the provision of the data management service deletes or returns all personal data to the data controller and deletes the existing copies, unless EU or Member State law requires storage of personal data;
- provides the data controller with all the information that is in this article necessary to prove the fulfillment of certain obligations, and which enabled and facilitated by the data controller or another controller commissioned by the data controller conducted audits, including on-site inspections.

## Data subjects' rights in relation to data processing

The data subject may request information on the processing of his or her personal data and may request the rectification of his or her personal data, or, except in the case of processing required by law without undue delay in the manner indicated when the data were collected.

At the request of the data subject, the controller shall provide information on the processing of personal data by the controller or by a processor on its behalf, the purposes, legal basis and duration of the processing, the name, address (headquarters) and the purposes, duration and the data processing activities of the data controller, as well as who receives or has received the data and for what purposes. The controller shall give the information, within the shortest possible time from the date of the request, but not later than 15 days in writing and in an intelligible form. This information shall be provided free of charge if the person requesting the information has not submitted a request for information in the same field in the current year to the same subject matter to the controller. In other cases, the Foundation shall charge a fee.

The data controller deletes the personal data if the processing is illegal, the data subject requests it, the purpose of the data processing has ceased, or the statutory period for data storage has expired, or it is ordered by a court or the National Data Protection and Freedom of Information Authority.

The Foundation will notify the person concerned about the correction and deletion, as well as all those to whom previously the data was transmitted for the purpose of data management. The notification is omitted if this is the data management in view of its purpose, it does not harm the legitimate interests of the data subject.

The data subject may object to the processing of his personal data if

- personal data is managed (forwarded) only by the data controller or the data recipient in order to enforce their right or legitimate interest, unless the data management was ordered by law;
- personal data is used or forwarded for the purpose of direct business acquisition, public opinion research or scientific research;
- exercising the right to protest is otherwise permitted by law.

The Foundation - with the simultaneous suspension of data management - requests the protest examines it as soon as possible, but no later than 15 days after its submission, and informs the applicant of its results in writing. If the protest is justified, that is data controller terminates and locks the data - including further data collection and data transmission - as well as about the protest or the action taken based on it notifies all those to whom the personal data affected by the protest will be notified of the measures forwarded earlier, and who are obliged to take measures to enforce the right to protest.

If the data subject does not agree with the decision made by the data controller - within 30 days of its notification - can go to court. The Foundation cannot delete the data if the data management was

mandated by law. However, the data cannot be forwarded for the data recipient, if the data controller agreed with the protest, or the court states the legitimacy of the protest. With the possibility of legal redress, a complaint can be sent to the National Data Protection and Freedom of Information Authority:

- Székhely: 1055 Budapest, Falk Miksa utca 9-11.
- Postacím: 1363 Budapest, Pf.: 9.
- Telefon: +36 (1)391-1400
- URL: <https://naih.hu>
- E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## The possibility of amending the data management policy

The data controller reserves the right to unilaterally change the present privacy policy with prior notice of users. By using the service from the date of entry into force of the amendment, you accept the amended Privacy Policy.

The Foundation's activities, information security and the most important legislation and standards relating to the Foundation's activities and the processing of personal data,

- Fundamental Law of Hungary (Article VI (3) para.)
- Law CXII of 2011 on the right to information self-determination and freedom of information
- Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the management of personal data and the free flowing of such data
- Law XXXIV of 2019 implementing the data protection reform of the European Union about the necessary amendments to the law
- Act V of 2013 on the Civil Code (Part Three - Privacy rights, XI.; XII.)
- Law XLVIII of 2008 on the basic conditions of economic advertising activity and about some of its limitations
- Act I of 2012 on the Labor Code
- 2017 CL. law on taxation
- Act C of 2000 on accounting
- CLV of 1997. act on consumer protection
- 2016 CLV. Act on Official Statistics
- LXXVII of 2013 Act on adult education
- MSZ EN 60950 Safety regulations for data processing equipment and office machines
- MSZ ISO/IEC 27001:2014 Information technology. Safety technology. Information security management systems. Requirements

## Related documents

- Data Protection Policy
- Data management policy of the camera surveillance system



- Area monitored by camera (information for customers, visitors, guests)

Budapest, April 22, 2022.

Dr. Tamás Dezső

the chairman of the board of trustees