DATA MANAGEMENT INFORMATION

1. Data Controller

Name: Csányi Foundation for Children
Address: 1125 Budapest, Lóránt utca 5/a.
Representative of the Data Controller: Dr. Miklós Radoszáv
Data Controller's Data Protection Officer: Gill & Murry Zrt.
Contact details of the Data Controller regarding data protection: dpo@csanyialapitvany.hu

This notice is a unilateral commitment of the controller in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the applicable national legislation.

This notice may be unilaterally amended and/or withdrawn by the Data Controller at any time, subject to the Data Subjects being informed at the same time. The information shall be provided by publication on the website or, depending on the nature of the change, by direct notification to the Data Subjects.

2. Purpose of processing

2.1 To take and publish photos and videos on the day of the admission on the website and social media platforms of the Data Controller and for internal use by the Foundation

The Data Controller takes photos and videos of the applicants' adult family members and other persons present on the Selection Day for the purpose of selection for the Life Path Programme and uses them for the Foundation's communication.
Legal basis for processing: legitimate interest of the controller (Article 6(1)(f)) - The controller has a legitimate interest in processing the data from the selection day in order to assess the application and to obtain a complete picture of the applicant and his/her family, to use the photos and videos of the event to present the Foundation's operations on its website and to use them for the internal functioning of the Foundation.
Stakeholders.
Scope of data processed: portrait, body image
Intended time limit for processing: until the Data Subject raises a legitimate objection
Data processors: N/A
Recipients: Chair and members of the Board of Trustees, Founder, Supervisory Board
Source of data collection: data from data subjects

The data controller will reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended end date of processing: N/A

2.2 Taking photos and videos of the fundraising event for publication on websites, social media and promotional materials

The controller takes photos and videos of its events and programmes, which may be published on the controller's website, Facebook and other social media platforms, online and offline media platforms and stored in its own organisational databases.
Legal basis for processing.
Stakeholders.
Scope of data processed: voice, facial and body image

Intended time limit for processing: until the day the Foundation ceases to operate or until the Data Subject raises a legitimate objection
Data processors: photographer, video service provider
Recipients: social media sites
Source of data collection: data from the data subject

The data controller shall reclassify it after the expiry of the time limit for the following processing purposes:
New purpose of processing: N/A
Intended end date of processing: N/A

2.3 Processing and recording of data of persons invited to events organised by the Data Controller

The data of invited persons at events organised by the Data Controller will be recorded.
Legal basis for processing: legitimate interest of the controller (Article 6(1)(f)) - The controller has a legitimate interest in organising events promoting or related to its activities and in processing and recording the data of the invited persons for the purposes of invitations and contacts.
Data subjects: Invitees
Scope of data processed: name, telephone number, job title, address, e-mail address, shirt size
Intended time limit for processing: first data expiry date of the 10th year following the event or until the Data Subject's justified objection
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the Data Subject

The controller will reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.4 Registration of data of invited guests and their contacts at events organised by the Data Controller

Processing of the data of invited guests and their contacts at events organised by the Data Controller for the purpose of preparing and storing the documents necessary for the organisation of the event.
Legal basis for processing.
Data Subjects.
Data processed: name, telephone number, e-mail address, data necessary for invoicing the fee
Intended time limit for processing: first date of data release in the year following the performance or until the Data Subject raises a legitimate objection
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the data subject

The data controller shall reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.5 Accommodation at events organised by the Data Controller

At events organised by the Data Controller, the Data Controller will provide accommodation for participants (sponsors) and other invited guests at events, as well as for employees of subcontractors involved in the organisation of the event.
Legal basis for processing: legitimate interest of the Data Controller (Article 6(1)(f)) - The Data Controller has a legitimate interest in processing the data necessary to provide accommodation for the

purposes of organising the event and to ensure the proper provision of accommodation for the invited participants

Data subjects: beneficiaries, invited guests, employees of subcontractors

Data processed: name, telephone number, position, address, e-mail address, postal code, full address abroad, arrival, departure, food allergies

Intended time limit for processing: first data cut-off date of the 5th year following the event or until the Data Subject raises a legitimate objection

Data processors: N/A

Recipients: accommodation establishments

Source of data collection: data from the data subject

The data controller shall reclassify it after the expiry of the time limit for the following processing purposes:

New purpose of processing: N/A

Intended end date of processing: N/A

2.6   G-Suite account provision

The Data Controller will provide a G-Suite account (email address, password) to the beneficiary and his/her legal representative.

Legal basis for processing: performance of a contract (Article 6(1)(b))

Data Subjects: grantee, legal representative, development subcontractors

Data processed: name, e-mail address, password

Intended duration of processing: Until the duration of the grant contract

Data processors: N/A

Recipients: Google Inc.

Source of data collection: Data from the Data Controller

The data controller will reclassify the data for the following processing purposes after the expiry of the time limit:

New purpose of processing: N/A

Intended end date of processing: N/A

2.7   Protection of property, personal security, by means of electronic video surveillance system at the Data Controller's headquarters, premises (Semmelweis Street) and branches (Community Houses)

Operation of an electronic video surveillance system at the entry points of the area protected by the Data Controller and, in certain cases, in common areas of common use (e.g. garden).

Legal basis for processing.

Data subjects: Employees, beneficiaries, persons entering the monitored area.

Scope of data processed: facial and body image

Intended time limit for processing: 30 days or until the Data Subject raises a legitimate objection

Data processors: security service provider

Recipients: N/A

Source of data collection: data from the data subject

The controller will reclassify the data for the following processing purposes after the expiry of the time limit:

New purpose of processing: N/A

Intended time limit for processing: N/A

2.8   Yearbook and other publications

The Data Controller publishes a yearbook and other publications to promote the Foundation, including pictures of the Foundation's achievements, employees, supporters and donors.

Legal basis for processing.
Data subjects: Employees, Beneficiaries, Donors, Employees of Cooperating Partners, Chairperson and members of the Board of Trustees, Founder, Members of the SC.
Scope of data processed: photo
Planned deadline for data processing: 25 years after the publication of the Yearbook, on the day after the data expiry date.
Data processors: N/A
Recipients.
Source of data collection: Data from the data subject

The controller will reclassify the data for the following processing purposes after the expiry of the deadline:
New purpose of processing: N/A
Intended end date of processing: N/A

2.9 Contract performance with contractors (individual, sole proprietor) directly involved in the provision of grants, carrying out the required inspections

Contact management, contract creation, performance, modification, termination, personal contact, contact data management, data reconciliation and updating, proof of performance with contractors involved in the provision of support (development, training) and studies (psychologist).
Legal basis for processing: performance of a contract (Article 6(1)(b))
Data subjects: Contracted individual, sole trader
Data processed: name, address, date of birth, place of birth, mother's name, e-mail address, bank account number. In the case of a sole trader, also: registration number, tax number
Intended time limit for data processing: the data must be deleted on the day following the 4th year after the termination of the contract
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the data subject

The controller will reclassify the data for the following processing purposes after the expiry of the deadline:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.10 Contract performance with contractors (legal entity) directly involved in the provision of grants, performance of required inspections Processing of contact details

Contact, establishment, performance, modification, termination of contract, personal contact, management of contact details, data reconciliation and updating, proof of performance with the legal entities entrusted with the provision of the grants (development, training) and the studies (psychologist).
Legal basis for processing.
Data subjects: Contact person of the principal
Data processed: name, e-mail address, telephone number, position
Intended time limit for processing: until the end of the 4th year after the termination of the contract, the day of the data expiry or until the Data Subject's justified objection
Data Processors: N/A
Recipients: N/A
Source of data collection: Data from the Data Subject or his/her employer

The controller shall reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A

Intended time limit for processing: N/A

2.11 Proof of performance in the case of contracts for the award of grants, registration of certificates of performance

The data controller shall process the data of the beneficiary provided in the certificate of performance in order to verify the performance of the contract, the attendance and shall keep a record thereof.

Legal basis for processing: legitimate interests of the controller (Article 6(1)(f)) - The controller has a legitimate interest in processing the data of participants in certain activities in order to monitor the performance of contracts

Processing of special categories of data: explicit consent of the data subject (Article 9(2)(a))

Those affected: Representatives of clients, beneficiaries, mentor workers

Scope of data processed: name and signature of the representatives of the beneficiaries, name and code of the beneficiaries present, name and code of the absent beneficiaries, name and signature of the mentor, data provided in the psychological summary

Planned time limit for processing: 10 years after the end of the grant contract, until the end of the 10th year following the date of the data release or until the Data Subject's justified objection

Data processors: N/A

Recipients: N/A

Source of data collection: Data from delegates, mentors

The controller will reclassify the data for the following processing purposes after the expiry of the time limit:

New purpose of processing: N/A

Intended end date of processing: N/A

2.12 Management and storage of mentor weekly reports

The Data Controller will process and store the weekly reports submitted by mentors on the activities they have carried out and, in this context, will process the data of the persons included in the report.

Legal basis for processing: performance of the contract (Article 6(1)(b))

Specific data processing conditions: explicit consent of the data subject (Article 9(2)(a))

Data subjects: Mentor workers, beneficiaries, family members of beneficiaries, volunteers, developers

Scope of data processed: Name, data provided in weekly report, specific data provided in weekly report

Intended time limit for data processing: 10 years after the end of the grant contract, on the day following the end of the 10th year of data release

Data processors: N/A

Recipients: N/A

Source of data collection: Data from the employee

The data controller will reclassify the data for the following processing purposes after the expiry of the deadline:

New purpose of processing: N/A

Intended date of processing: N/A

2.13 Proposal, order management

Registration of orders, quotations until the contract is concluded or the order fails, processing of questions, requests for quotations, replies to requests for quotations, issuing of quotations to the central e-mail address of the controller or to the e-mail address of a colleague.

Legal basis for processing.

Data subjects.

Data processed: name, address, email address, telephone, data indicated in the offer/order

Intended time limit for processing: until the conclusion of the contract or until the expiry of the data protection period of 1 year after the order has failed or until the data subject has given his/her justified objection

Data processors: N/A
Recipients: N/A
Source of data collection: Data from the data subject or his/her employer

The controller shall reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: contact, performance of contract - with non-natural person Partners and natural person Customers
Intended time limit for processing: until the first date of expiry of the first data release in the 4th year following the termination of the partnership contract or until the Data Subject's justified objection.

2.14 Issuance of invoices and related documentation (performance certificate) for the performance of the contract

Issuing an invoice and issuing documentation related to the performance of a contract or the provision of a service.
Legal basis for processing: to comply with a legal obligation to which the controller is subject (Article 6(1)(c))
Data subjects: contacts, representatives of legal persons using the service, natural persons using the service
Scope of the data processed: billing name and address, contact name, position, in case of sole trader also: registration number, registered office, tax number
Intended time limit for data processing: Date of the annual data release following the 8th year after the invoice was issued
Data processors: N/A
Recipients: Authority
Source of data collection: Data from the data subject or his/her employer

The data controller shall reclassify the data for the following processing purposes after the expiry of the deadline:
New purpose of processing: N/A
Intended end date of processing: N/A

2.15 Postal management, mail handling

Recording of registered and recorded delivery postal items related to the activities of the controller, as well as items sent by other service providers.
Legal basis for **processing**.
Data subjects: recipients, senders of postal items.
Data processed: name, address
Intended time limit for processing: 5 years after the date of dispatch, the date of expiry of the data or until the Data Subject objects
Data processors: N/A
Recipients: Hungarian Post, other postal service provider
Source of data collection: data from the Data Subject or Partner

Data controller will reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended end date of processing: N/A

2.16 Maintenance of contacts, conclusion and performance of contracts - with non-natural persons

Contact management, contract creation, performance, modification, termination, personal contact, contact data management, data reconciliation and updating, complaint management.
Legal basis for processing.
Data subjects: Contact persons of customers, service users, suppliers

Data processed: name, e-mail address, telephone number, position,
Planned time limit for processing: until the date of the data expiry 4 years after the termination of the partnership contract or until the data subject's justified objection
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the data subject or from the Partner

The controller shall reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended end date of processing: N/A

2.17 Date of termination of the contract: Date of termination of the contract: Date of termination of the contract: Date of termination of the contract: expires

Kapcsolattartás, szerződés létrehozása, teljesítése, módosítása, megszüntetése, személyes kapcsolattartás, kapcsolattartói adatok kezelése, adategyeztetés és adatfrissítés, reklamáció kezelése.
Legal basis for processing: performance of a contract (Article 6(1)(b))
Data subjects: natural person partners
Data processed: name, address, date of birth, place of birth, mother's name, e-mail address, tax number, in the case of a sole trader, and: registration number
Intended time limit for processing: date of data expiry 4 years after the termination of the partnership contract or until the data subject's justified objection
Data processors: N/A
Recipients: N/A
Source of data collection: Data from data subject or partner

The controller shall reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.18 Contact with the Chair of the Board of Trustees and members of the Board of Trustees, members of the SC, founder

The Data Controller stores the data of the members of the Board of Trustees, the founder, members of the Supervisory Board for contact and administrative purposes.
Legal basis for processing.
Data subjects.
Data processed: name, telephone number, e-mail address, address, date and place of birth, identity card number, nationality
Intended time limit for processing: until the termination of the legal relationship or until the data subject raises a legitimate objection
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the data subject

The controller will reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.19 Contact based on online enquiry

Contact by sending an e-mail via the controller's website or by sending an e-mail to info@csanyialapitvany.hu .
Legal basis for processing: consent of the data subject (Article 6(1)(a))
Data subjects: contact initiators

Data processed: Name, e-mail address, data provided in the message
Intended time limit for processing: the date of the conclusion of the contract or the date of the annual data expiry after 4 years from the date of contact or until the withdrawal of the data subject's consent
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the Data Subject

The controller will reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.20 Financial share point record keeping

The Data Controller shall keep financial records of the data and documents relating to the economic and financial operation of the Foundation.
Legal basis for processing: legitimate interests of the Data Controller (Article 6 (1) f) - The Data Controller has a legitimate interest in ensuring the business continuity, traceability and proper functioning of the recording and management of financial and economic data and documents.
Data subjects: Employees, beneficiaries, partners, agents, subcontractors
Data processed: data contained in documents in the financial register
Planned time limit for processing: until the date of the expiry of the data protection period of 10 years following the end of the transaction concerned or until the data subject's legitimate objection
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the Data Controller or Data Subjects

The controller shall reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.21 HR record keeping

The Data Controller manages the Foundation's employment documents in an HR register.
Legal basis for processing: legitimate interests of the controller (Article 6(1)(f)) - The controller has a legitimate interest in ensuring the business continuity, traceability and proper functioning of the Foundation by recording and managing employment data and documents.
Data subjects: Employees
Scope of data processed: data contained in documents in HR records
Planned time limit for processing: the date of the data expiry after the retirement age of the employee concerned + 5 years or until the data subject's justified objection
Data processors: N/A
Recipients: N/A
Source of data collection: Data from the Data Controller or Data Subjects

The controller shall reclassify it for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.22 Registration of budget-related material

The Data Controller shall keep a register of budget-related documents.
Legal basis for processing: legitimate interest of the controller (Article 6(1)(f)) - The controller has a legitimate interest in ensuring the business continuity, traceability and proper functioning of the budget data and documents.
Data subjects: Employees, partners, agents, subcontractors
Scope of data processed: data contained in documents in the budgetary register
Planned time limit for processing: Until the Foundation is operational

Data processors: N/A
Recipients: N/A
Source of data collection: Data from the Data Controller or Data Subjects

Data controller will reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.23 Purpose of the purpose of the action: to be used for the purpose of the clearance of accounts

In order to settle applications, the Data Controller, as the applicant, must keep the documentation relating to the application and the documents of performance.
Legal basis for processing.
Data subjects: employees of the Data Controller, employees of subcontractors.
Scope of the data processed: name, tender role
Intended time limit for processing: the date of the annual expiry of the data following the prescribed maintenance period or the prescribed retention period after the closure of the tender accounts, or until the data subject's legitimate objection
Data processors: Application writing companies
Recipients: Tenderer
Source of data collection: Data from the data subject or the controller

The controller will reclassify the data for the following processing purposes after the deadline:
New purpose of processing: N/A
Intended end date of processing: N/A

2.24 Insurance of travel insurance and sports activities insurance

The Data Controller will take out the necessary travel insurance for employees, sponsors, volunteers and developers, and sports insurance for sponsors' sporting activities, manage the insurance data and record insurance events.
Legal basis for processing.
Data subjects: Employees, beneficiaries, volunteers, developers
Data processed: name, place of birth, date, address, ID card number, passport number, insurance details, accident details, details provided in student certificate, details provided in employment certificate
Planned time limit for processing: the date of expiry of the data after the first year following the termination of the employment relationship, in the case of an insurance claim, until the date of the closure of the claim or until the Data Subject's objection is deemed justified, in the case of a Beneficiary, the date of expiry of the data after the 25th year following the termination of the grant contract
Data processors: N/A
Recipients: Insurer
Source of data collection: Data from the Data Subject - Insurer

The data controller shall reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.25 Processing of cookies necessary for the use of the website

The data controller places cookies and web beacons on the website in order to connect to the user's endpoint device and to provide the service (mandatory cookies).
Legal basis for processing: consent of the data subject (Article 6(1)(a))

Data subjects: users visiting the website
Scope of data processed: personal identifiers related to Internet browsing
Intended time limit for processing: until the end of the session or the time limit specified in the cookie
Data processors: IT operator, Website operator, marketing agency, hosting provider
Recipients: N/A
Source of data collection: Data from the data subject

The controller shall reclassify it after the expiry of the time limit for the following processing purposes:
New purpose of processing: N/A
Intended end date of processing: N/A

2.26 Setting cookies management

The data controller collects information through the use of preference cookies, which change the way the website works or looks according to the visitor's needs.
Legal basis for processing: consent of the data subject (Article 6(1)(a))
Data subjects: users visiting the website
Scope of data processed: personal identifiers related to Internet browsing
Intended time limit for processing: until the deadline specified in the cookie
Data processors: IT operator, Website operator, marketing agency, hosting provider
Recipients: N/A
Source of data collection: Data from the data subject

The data controller will reclassify the data for the following processing purposes after the expiry of the deadline:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.27 Processing of statistical cookies

Through the collection and reporting of data in anonymous form, statistical cookies help the controller to understand how visitors interact with the website.
Legal basis for processing: consent of the data subject (Article 6(1)(a))
Data subjects: users visiting the website
Scope of data processed: personal identifiers related to Internet browsing
Intended time limit for processing: until the deadline specified in the cookie
Data processors: IT operator, Website operator, marketing agency, hosting provider
Recipients: N/A
Source of data collection: Data from the data subject

The data controller will reclassify the data for the following processing purposes after the expiry of the deadline:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.28 Legal or other claims, debt recovery

The controller shall retain and process the personal data it processes for the purposes of legal claims and the recovery of claims after the expiry of the processing time limit for the original purpose of the processing and during the general limitation period.
Legal basis for processing: legitimate interests of the controller (Article 6(1)(f)) - The controller has a legitimate interest in keeping personal data of data subjects relating to it for the purpose of pursuing legal claims during the general limitation period.
Data subjects: contractual partners, their contact persons in the case of a legal person, employees, beneficiaries, relatives of beneficiaries
Data processed: data necessary for the enforcement of a legal claim (name, address, date of birth, mother's name, debt, amount of claim, other claim)

Intended time limit for processing: until the end of the general limitation period for the enforcement of the relevant legal claim or until the Data Subject's objection is deemed justified
Data processors: legal counsel
Recipients: court, authority, legal representative
Source of data collection: Data from the data subject

The data controller shall reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Planned deadline for data processing: N/A

2.29 Data processing related to GDPR Regulation

Processing in the context of the GDPR Regulation.
Legal basis for processing: to comply with a legal obligation to which the controller is subject (Article 6(1)(c))
Data subjects: All Érinett
Scope of data processed: name, e-mail address
Intended time limit for processing: Not to be deleted
Data processors: legal advisor, GDPR advisor
Recipients: Authority,
Source of data collection: Data from the data subject

Data controller: Data controller: Legal representative: Data controller: Data controller: Data controller: Legal representative: Data controller: Data controller: Data controller: Data controller: Data controller: Data controller: Data subject:
New purpose of processing: N/A
Intended time limit for processing: N/A

2.30 IT system operation, IT business continuity and data backup

Operation of IT infrastructure, including the operation of workstations, servers and network elements, archiving and backup of data and their recovery in the event of a disaster.
Legal basis for processing.
Data subjects: contractual partners, their contact persons in the case of legal persons, employees, beneficiaries, relatives of beneficiaries
Data processed: all categories of digital data collected or processed by the Data Controller
Planned time limit for data processing: 30 days in the case of data backup of the IT system, or 2 years after backup in the case of data archiving, or until the Data Subject raises a legitimate objection
Data processors: IT operator
Recipients: N/A
Source of data collection: data from the data subject, the data subject's employer or the partner, customer

The data controller shall reclassify the data for the following processing purposes after the expiry of the time limit:
New purpose of processing: N/A
Intended end date of processing: N/A

3. Consequence of non-delivery

Possible consequence of non-delivery of the data: failure of the purpose of the processing.

4. Scope of data to be provided

The Data Controller does not indicate the mandatory data in each of the data submission interfaces where all data are mandatory. In those areas where the provision of all data is not mandatory, the Data Controller shall indicate the mandatory fields by displaying an asterisk*.

5. Children

In any case, personal data of children will only be processed with the consent or authorisation of the person having parental authority over the child in case of a legal basis under Article 6(1)(a).

6. Information on the use of a data processor

The Data Controller shall, in the course of processing, transfer the data to the Data Processor(s) contracted by the Data Controller. The categories of Processor(s) are set out in point 2 under the purposes of the processing.

7. Persons entitled to access the data

The Data Controller shall not disclose the data disclosed to third parties other than the Processor(s) or Recipient(s) indicated in point 2. Only employees of the Data Controller and designated employees of the Data Processor(s) shall have access to the processed data.

7.1 Access to video surveillance data

The recordings will not be disclosed by the controller to third parties, with the exception of the asset protection service provider indicated in point 7. Only designated employees of the controller and the data processor(s) shall have access to the recordings.

In case of suspicion of a criminal offence or other unlawful act in connection with the recorded recordings, or upon request, the Data Controller may forward the recordings to the competent investigative authorities, the competent bodies of the NAV or the courts.

The Data Protection Officer, the Data Protection Manager, the Asset Protection Service Provider and the Chief Operating Officer may have access to the recordings previously recorded by the electronic surveillance system. The Data Subject may, at his/her request, have access to the recordings of his/her person only in the presence of one of the above-mentioned persons. In all cases, access must be requested in writing to the Data Protection Officer.
In all cases, the Data Controller shall draw up a record of the fact of access, which shall be kept by the Foundation for 1 year.

7.2 Persons entitled to restrict access to images from the electronic surveillance system are

The restriction of the images recorded by the electronic surveillance system may only be implemented in cases where the Data Controller has detected an event that is likely to jeopardise the purpose pursued by the electronic surveillance system.
At the request of the Data Subject, the processing of recordings of his or her person may be restricted. The Data Subject must request the blocking in writing to the Data Protection Officer, indicating the purpose and the expected duration of the blocking.
The Data Controller shall keep a record of each step of the blocking process for a period of 1 year.

7.3 Disclosure of data

The Controller shall not make public the recordings of the electronic surveillance system.

8. Processing of data received from third parties

Where the data subject does not provide his/her own data to the Data Controller but that of another natural person, the data subject shall be solely responsible for providing the data with the consent, knowledge and appropriate information of that natural person. The Data Controller is not obliged to verify the existence of these. The Data Controller draws the attention of the data importer to the fact that if the data importer fails to comply with this obligation and the Data Subject therefore asserts a claim against the Data Controller, the Data Controller may pass on the asserted claim and the amount of the related damage to the data importer.

9. Transfers to third countries or international organisations

The Data Controller transfers the Data Subject's personal data to a third country or international organisation outside the European Economic Area with regard to the condition set out in Article 49(1)(b) GDPR (for the performance of a contract with the Data Subject).

10. Rights of data subjects

The Data Subject may contact the Data Controller at the contact details indicated in point 1.
- may request access to a copy of their personal data processed by the Controller,
- request rectification of his/her data,
- request information on the purposes and legal basis of the processing,
- request the erasure of their personal data and the restriction of processing,
- request the transfer of his/her data to another controller, where the processing is based on a contract or consent and is processed by the Controller by automated means,
- have the right to withdraw the consent previously given to the processing.

The Data Subject may exercise the above rights at any time.
The Data Subject may also send his or her request to the Controller at the contact address indicated in point 1.

The Data Controller shall process or reject (with reasons) the notification within 1 month of the request being made at the latest, or in exceptional cases within a longer period permitted by law. It shall inform the Data Subject in writing of the outcome of the investigation.

10.1 Cost of the information

The Data Controller shall provide the measures and the necessary information **free of charge for** the first time.
If the Data Subject requests the same data for a second time within a period of one month and the data have not changed during that period, the Data Controller shall charge an administrative fee as set out below:
- The basis of calculation of the administrative charge shall be the hourly cost of the current minimum wage as an hourly rate.
- The administrative cost is the number of working hours used to provide the information, calculated on the basis of the above hourly rate.
- In the case of a request for information on paper, the cost of printing the reply at cost price and the cost of postage will be charged.

10.2 Refusal of information

If the Data Subject's request is manifestly **unfounded**, if he or she is not entitled to receive the information or if the Data Controller can prove that the Data Subject has the information requested, the Data Controller shall refuse the request for information.

If the Data Subject's request **is excessive,** in particular because of its repetitive nature (the third time within a month that the Data Subject has made a request to exercise his or her rights under Articles 15 to 22 on the same subject), the Controller may refuse to act on the request.

10.3 Right to object

The Data Subject shall have the right to object at any time to the processing of his or her personal data on the basis of a legitimate interest or a legitimate expectation on the part of public authority.
In this case, the Data Controller may no longer process the personal data, unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.
If the Data Controller establishes that the legal grounds for the objection are justified, it shall as soon as possible cease the processing, including the transfer and further processing. It shall inform all those to whom it has previously transferred the Data Subject's data of the objection.
The handling of the request shall be free of charge, except for unfounded or excessive requests, for which the Data Controller may charge a reasonable fee corresponding to its administrative costs. If the Data Subject disagrees with the decision taken by the Controller, he or she may take legal action.

11. Information on data security measures

The Data Controller shall process the data in a closed system in accordance with the requirements of the Information Security Policy.
The Data Controller ensures that data protection is provided by default and built-in. To this end, the Data Controller shall apply appropriate technical and organisational measures to ensure that:
- precisely control access to the data;
- Allow access only to persons who need the data to perform the task for which it is collected, and then only to the minimum necessary for the performance of that task;
- carefully select the data processors it engages and ensure the security of the data through appropriate data processing contracts;
- ensure the integrity (data integrity), authenticity and protection of the data processed.

The Data Controller shall implement reasonable physical, technical and organisational security measures to protect the Data Subjects' data, in particular against accidental, unauthorised or unlawful destruction, loss, alteration, disclosure, use, access or processing. The Data Controller shall notify the Data Subject without undue delay in the event of known unauthorised access to or use of the personal data which is likely to present a high risk to the Data Subject.

The Data Controller shall, where it is necessary to transmit Data Subject's data, ensure that the data transmitted are adequately protected, for example by encrypting the data file. The Controller shall be fully responsible for the processing of the Data Subject's data carried out by third parties.

The Data Controller shall also ensure that the Data Subject's data are protected against destruction or loss by appropriate and regular backups.

12. Remedies

Any data subject may, in his or her opinion
   a) the Data Controller restricts the exercise of his/her rights or refuses his/her request to do so, he/she may submit a complaint to the National Authority for Data Protection and Freedom of Information for an investigation to examine the lawfulness of the Data Controller's action;

b) in the processing of personal data, the Controller infringes the legal provisions on the processing of personal data,

- request the National Authority for Data Protection and Freedom of Information to initiate proceedings before the data protection authority; or
- take legal action against the Data Controller and, if he/she so chooses, bring the action before the competent court of his/her place of residence or domicile.

Contact details of the National Authority for Data Protection and Freedom of Information:

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Budapest, 01.07.2025.