

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 Radoszav

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This notice may be unilaterally amended and/or withdrawn by the Data Controller at any time, subject to the Data Subjects being informed at the same time.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 into 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 deadline has expired:

New purpose of processing: N/A

Intended date of processing: N/A

2.2 Date of implementation: Date of implementation: Date of implementation: Date of implementation: soon

The Data Controller will create a closed media group to facilitate more efficient and faster communication of Foundation programs, events, organizational tasks, changes of dates.

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

Data subjects: 1.

Data processed: name, facebook account details

Intended duration of data processing: until the duration of the Grant Contract

Data processors: N/A

Recipients: META Inc.

Source of data collection: data from data subjects

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

New purpose of processing: N/A

Intended date of processing: N/A

2.3 To publish photos and videos of the fundraising event on websites, social media and promotional materials

The data controller shall take photos and videos of its events and programmes, which may be published on its 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, face 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 will reclassify the data for the following processing purposes after the expiry of the time limit:

New purpose of processing: N/A

Intended date of processing: N/A

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

The data controller takes photos and video footage of its events and programmes, including those of its grantees and employees, which the data controller may publish on its website, Facebook and other social media platforms, online and offline media platforms, and store in its own organisational databases.

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

Data subjects: beneficiaries and their legal representatives, minor family members, employees of the Foundation, volunteers.

Data processed: voice, face and body image

Intended time limit for processing: until the day the Foundation ceases to operate

Data processors: photographer, video service provider

Recipients: social media sites

Source of data collection: Data from the data subject

Data controller will reclassify the data for the following processing purposes after the deadline:

New purpose of processing: N/A

Intended date of processing: N/A

2.5 Protection of property and personal security by means of an electronic video surveillance system at the Data Controller's headquarters, premises (Simmelweis 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: face 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

After the deadline has expired, the controller shall reclassify it for the following processing purposes:

New purpose of processing: N/A

Intended date of processing: N/A

2.6 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: chairman and members of the Board of Trustees, Founder, members of the SC, Cooperating partners, working donors, grantees, donors

Source of data collection: Data from data subjects

The controller will reclassify the data for the following processing purposes after the deadline has expired:

New purpose of processing: N/A

Intended date of processing: N/A

2.7 Recruitment, reception of volunteers

The Data Controller employs volunteers on a permanent or ad hoc basis on a contractual basis to assist the Foundation's activities as a host organisation for volunteers.

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

Data subjects: volunteers, legal representative of the volunteer

Data processed: name, address, place and date of birth, mother's name, for volunteers only: telephone number, email address, benefits

Intended time limit for data processing: data release date 4 years after the end of the volunteer contract

Data processors: N/A

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 date of processing: N/A

2.8 Processing and storage of mentor weekly reports

The Data Controller shall process and store the weekly reports submitted by mentors on the activities they have carried out and, in this context, 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 employer

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

New purpose of processing: N/A

Intended date of processing: N/A

2.9 Date of implementation: Date for which the period of validity of the contract is to be set: 31.12.2011

In the case of travel of employees and beneficiaries, the Data Controller takes out the necessary travel insurance, takes out sports insurance for the sporting activities of beneficiaries, manages the data of the insurance policies, and keeps records of insurance events.

Legal basis for processing:

Data subjects: Employees, beneficiaries, volunteers, developers

Data processed: name, place of birth, date of birth, address, identity card number, passport number, insurance details, accident details, details provided in student certificate, details provided in employment certificate

Intended time limit for processing: the date of the first data expiry following the first year after 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 the 25th data expiry 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 deadline:

New purpose of processing: N/A

Intended date of processing: N/A

2.10 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

After the deadline has passed, the data controller will reclassify the data for the following processing purposes:

New purpose of processing: N/A

Intended date of processing: N/A

2.11 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

After the deadline has passed, the data controller will reclassify the data for the following processing purposes:

New purpose of processing: N/A
Intended date of processing: N/A

2.12 Processing of statistical cookies

By collecting and reporting data in an 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))
Affected parties: 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

After the deadline has passed, the data controller will reclassify the data for the following processing purposes:

New purpose of processing: N/A
Intended date of processing: N/A

2.13 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

Scope of 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, etc.)

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 has made a legitimate objection

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
Intended date of processing: N/A

2.14 Processing in the context of the 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

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 advisor:

New purpose of processing: N/A

Intended date of processing: N/A

2.15 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.

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 or customer

The data controller will reclassify the data for the following processing purposes after the deadline has expired:

New purpose of processing: N/A

Intended date of processing: N/A

2.16 Processing of documentation of intoxication check

The Data Controller shall carry out a drunkenness check among its employees and volunteers in order to verify that they are fit to work.

Legal basis for processing: to comply with a legal obligation to which the controller is subject (Article 6(1)(c))

Data subjects: Employees, volunteers

Data processed: name and job title of the person carrying out the checks, names and job titles of witnesses, name and job title of the worker inspected, job title of the worker inspected, results, signatures

Intended time limit for processing: first data release date 1 year after the inspection was carried out

Data processors: N/A

Recipients: N/A

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 deadline:

New purpose of processing: N/A

Intended time limit for processing: N/A

3. Consequence of non-disclosure

Possible consequence of non-delivery of 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 the provision of all data is 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

The Data Controller also employs volunteers under 18 years of age and therefore processes the data of volunteers under 18 years of age in connection with the volunteering contract and the reception.

In any case, the processing of personal data of children will only take place 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).

In addition to the above, we request that persons under the age of 18 do not provide Personal Data to the Controller. If we become aware that, in addition to the above, we have collected and are processing Personal Data from a child under the age of 18 in connection with the processing of data relating to volunteers, we will take the necessary steps to delete or lawfully process the data as soon as possible.

6. Information on the use of a data processor

The Data Controller transfers 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 recorded data.

7.1 Access to video surveillance data

The recordings shall 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 Data 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 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.
- may 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 result of the investigation.

10.1 Cost of the information

The Data Controller shall provide the measures or the necessary information **free of charge** for the first time.

If the Data Subject requests the same data for a second time within one month and the data have not changed during this period, the Data Controller shall charge an administrative fee as follows:

- 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**, the Data Subject is not entitled to receive the information or the Data Controller can prove that the Data Subject has the information requested, the Data Controller shall refuse the request for information.

Where 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 such a case, the 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 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 processing 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 shall ensure 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 person concerned, if in his or her opinion

- a) the Data Controller restricts the exercise of his or her rights or refuses his or her request to do so, may initiate an investigation by the National Authority for Data Protection and Freedom of Information 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 Controller, and may also bring such action before the courts of the place of residence or domicile of the Controller, at the place of its choice.

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

President: dr. Attila Péterfalvi

Address: 1055 Budapest, Falk Miksa str. 9-11.

Address for correspondence: 1363 Budapest, P.O. Box 9.

Tel.: +36-1-391-1400

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Budapest, 01.07.2025.