

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This notice may be unilaterally amended and/or withdrawn by the Data Controller at any time, subject to the Data Subjects being informed at the same time.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 Publication of the yearbook and other publications

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

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, employee, beneficiary, donors

Source of data collection: Data from data subjects

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

2.2 Registration of donors and donations

The data controller keeps records of monetary and non-monetary donations and the identity of donors.

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

Data subjects: donors

Scope of data processed: Name, amount

Intended time limit for processing: Until the Foundation ceases to exist

Data processors: Accounting firm, audit firm

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 deadline:

New purpose of processing: N/A

Intended time limit for processing: N/A

2.3 Collection and receipt of individual donations

Processing of donor data in connection with donations by one-off transfer, donations via SimplePay, NAV 1% donation.

Legal basis for processing: consent of the data subject (Article 6(1)(a))

Data subjects: donors

Data processed: name, address, e-mail address, last 4 characters of bank card, bank account number, date of donations, amount

Intended date of processing: date of the annual data release following the 8th year after the receipt of the donation

Data processors: Accounting firm, audit firm

Recipients: Chairman and members of the Board of Trustees and members of the SC

Source of data collection: Data from the data subject

After the expiry of the deadline, the data controller will reclassify the data for the following processing purposes:

New purpose of processing: N/A

Intended end date of processing: N/A

2.4 Conclusion and performance of donation contracts with natural persons

The Data Controller will conclude a donation contract with individuals who make a one-off or permanent donation.

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

Data subjects: donors

Data processed: name, address, mother's name, place and date of birth, tax identification number, identity card number, bank account number, date and amount of donations

Intended time limit for processing: Date of the annual data release following the 5th year after the end of the donation contract

Data processors: Accounting firm, audit firm

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

2.5 Conclusion and performance of donation contracts with legal entities

The Data Controller shall conclude a donation contract with legal persons providing a one-off or permanent donation.

Legal basis for processing: legitimate interest of the controller (Article 6(1)(f)) - The controller has a legitimate interest in processing contact details for the performance of the donation contract.

Data subjects: donor's contact persons

Data processed: name, e-mail address telephone number

Intended time limit for processing: date of the annual data release following the 5th year after the termination of the donation contract or until the Data Subject's justified objection

Data processors: accounting firm, audit firm

Recipients: N/A

Source of data collection: Data from the employer of the data subject

Data Controller: Employer of the data subject (data subject's employer):

New purpose of processing: N/A

Intended date of processing: N/A

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

New purpose of processing: N/A

Intended time limit for processing: N/A

2.7 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

2.8 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: data subject's consent (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

2.9 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.

Stakeholders: contractors, their contact persons in the case of legal persons, 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

Intended date of processing: N/A

2.10 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 Data Subjects

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:

New purpose of processing: N/A

Intended end date of processing: N/A

2.11 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 on the individual data submission interfaces, on which all data must be provided. 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 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 its purpose and the expected duration.

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 disclose the recordings of the electronic surveillance system to the public.

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 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 a period of 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 at the above hourly rate.
- In the case of a paper-based information request, 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 clearly **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 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 lodge a complaint with the National Authority for Data Protection and Freedom of Information to have the lawfulness of the Controller's action investigated;
- b) in the processing of personal data, the Controller infringes the legal provisions applicable to 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:

President: dr. Attila Péterfalvi

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

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Budapest, 01.07.2025.