

Privacy Policy

1. Definitions:

1. **Data processing** data processing' shall mean the technical operations involved in data control, irrespective of the method and instruments employed for such operations and the venue where it takes place, provided that such technical operations are carried out on the data.
2. **Data processor** shall mean a natural or legal person or unincorporated organization that is engaged in processing operations within the framework of and under the conditions set out by law, acting on the controller's behalf or following the controller's instructions.
3. **Controlling of data** shall mean any operation or set of operations that is performed upon data, whether or not by automatic means, such as in particular collection, recording, organization, storage, adaptation or alteration, use, retrieval, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction, and blocking them from further use, photographing, sound and video recording, and the recording of physical attributes for identification purposes (such as fingerprints and palm prints, DNA samples and retinal images).
4. **Privacy Policy** shall mean the present regulations.
5. **Controller** shall mean the natural or legal person, or unincorporated body which alone or jointly with others determines the purposes of the processing of data within the framework of law or binding legislation of the European Union, makes decisions regarding data processing (including the means) and implements such decisions itself or engages a data processor to execute them.
6. **Disclosure by transmission** shall mean making data available to a specific third party.
7. **Erasure of data** shall mean the destruction or elimination of data sufficient to make them irretrievable.
8. **Personal data breach** shall mean a breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
9. **Interested person** shall mean a natural or legal person, who is interested in the activities of the Foundation.
10. **Data subject** shall mean the Donators, Interested persons and the guests entering into the Webpage of the Foundation.
11. **GDPR** shall mean regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
12. **Authority:** shall mean the Hungarian National Authority for Data Protection and Freedom of Information (Seat: 1055 Budapest, Falk Miksa street 9-11.).
13. **Consent** shall mean any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
14. **Data Protection Act** shall mean Act CXII of 2011 on the right of informational Self-Determination and on Freedom of Information.
15. **Foundation** shall mean Fényes Jövő Jótékonyági Alapítvány (Court Registry Number: 01-01-0013590, Seat: 1054 Budapest, Honvéd utca 8. 1. em./2., e-mail: office@bright-future.foundation).
16. **Public disclosure** shall mean making data available to the general public.
17. **Webpage** shall mean the <https://bright-future.foundation/> page.

18. **Hungarian Civil Code** shall mean Act V of 2013 on the civil code.
19. **Personal data** shall mean any information relating to the data subject, in particular by reference to his name, an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity, and any reference drawn from such information pertaining to the data subject.
20. **Donator** shall mean a natural or legal person who has donated an amount for the Foundation.

2. Principles relating to controlling of personal data

2.1. Personal data shall be

- 2.1.1. controlled lawfully, fairly and in a transparent manner in relation to the Data subject (**principle of lawfulness, fairness and transparency**);
- 2.1.2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (**principle of purpose limitation**);
- 2.1.3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**principle of data minimisation**);
- 2.1.4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (**principle of accuracy**);
- 2.1.5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; (**principle of storage limitation**);
- 2.1.6. controlled in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (**principle of integrity and confidentiality**);
- 2.1.7. The Controller shall be responsible for, and be able to demonstrate compliance with Section 2.1.1.-2.1.6. of the Privacy Policy.

3. Data controlling conducted by the Foundation

	Data control 1. <i>Data control related to donations (except for cases of anonymous donations)</i>
Controlled data	Name, e-mail address, phone, address
Purpose of data controlling	Disclosure on the Webpage of the Foundation in the list of donators
Legal basis of the data control	GDPR Article 6 (1) a): Consent of data subject
Planned time of the data control	Until withdrawal of consent
Data subjects	Donators who do not want to remain anonymous
Name and contact details of data controller	Foundation (See section 1.15.)
Are the data transmitted?	
Are the data processed	
Purpose of data procession (if applicable)	
Form and place of storage	The controlled data are stored in electronic form on the server of the Foundation, which guarantees that only those persons have access to the personal data who are entitled to.
Persons entitled to know the data	Foundation and its workers

	Data control 2. Sending out newsletters
Controlled data	Name, e - mail address
Purpose of data controlling	Sending informational materials regarding the activities of the Foundation
Legal basis of the data control	GDPR Article 6 (1) a); Consent of data subject
Planned time of the data control	Until withdrawal of the consent
Data subjects	Interested persons
Name and contact details of data controller	Foundation (See section 1.15.)
Are the data transmitted?	
Are the data processed	
Purpose of data procession	
Form and place of storage	The controlled data are stored in electronic form on the server of the Foundation, which guarantees that only those persons have access to the personal data who are entitled to.
Persons entitled to know the data	Foundation and its workers

	Data control 3. Replying to messages from Interested persons
Controlled data	Interested person's name, e-mail address, phone number, address
Purpose of data controlling	Upon request of Data subject answering the messages and comments sent to the Foundation
Legal basis of the data control	GDPR Article 6 (1) a): Consent of data subject
Planned time of the data control	Until withdrawal of the consent
Data subjects	Interested persons
Name and contact details of data controller	Foundation (See section 1.15.)
Are the data transmitted?	
Are the data processed	
Purpose of data procession	
Form and place of storage	The controlled data are stored in electronic form on the server of the Foundation, which guarantees that only those persons have access to the personal data who are entitled to.
Persons entitled to know the data	Foundation and its workers

	Data control 4. <i>Keeping records of the measures related to exercising data subject rights in accordance with GDPR</i>
Controlled data	Name, contact information, decision, submission, registration data
Purpose of data controlling	Compliance with the obligation to register the exercise of data subject rights in accordance with GDPR (cp. Article 5 (2) and Article 10)
Legal basis of the data control	GDPR Article 6 (1) c): Controlling is necessary for compliance with a legal obligation to which the controller is subject
Planned time of the data control	For 5 years after the request is processed
Data subjects	Individuals requesting data subject access rights
Name and contact details of data controller	Foundation (See section 1.15.)
Are the data transmitted?	Only for the Authority upon Authority request
Are the data processed	
Purpose of data procession	
Form and place of storage	The controlled data are stored in electronic form on the server of the Foundation, which guarantees that only those persons have access to the personal data who are entitled to.
Persons entitled to know the data	Foundation and its workers; Authority (if requests so)

4. Disposal of personal data

- 4.1. If any changes occur in the controlled Personal Data, we ask the Data subjects to notify the Foundation of the changes within 3 days, in order to ensure the data's accuracy. In case the Data subject fails to notify the Foundation of change, the Foundation is not responsible for the accuracy of the data.
- 4.2. Any request regarding personal data deletion shall be submitted to the Foundation (via e-mail or in writing)
- 4.3. Once the request to delete or modify personal data has been fulfilled, the previous (deleted) data can no longer be recovered.

5. Rights of Data subjects regarding personal data control

Data subjects have the following rights in regards with data control

- 5.1. Right of access: the Data Subject shall request information on the controlled data, the purpose and time of data controlling and to whom the data is transferred, as well as the source of the controlled data.
- 5.2. Right to rectification: in case of change in the data of the Data subject, inaccurate or incomplete data recording, the Data subject shall have right to request correction, rectification or clarification.
- 5.3. Right to erasure: Data Subject shall request the erasure of his/her Personal data in the cases described in the Data Protection Act and the GDPR.
- 5.4. Right to restriction of controlling: Data Subject shall request the restriction of Personal data control in the cases described in Data Protection Act and the GDPR.
- 5.5. If a request set forth in Section 5.1-5.4. has been submitted, the Controller shall act in accordance with the provisions of the Data Protection Act and the GDPR and shall inform the Data Subject within one month of the measures taken on the basis of the request.
- 5.6. Right to withdraw consent: Data subject is entitled to withdraw Consent given for the controlling of Personal data which is controlled on the basis of Consent at any time, which, however, does not affect the lawfulness of the data control prior to the withdrawal.
- 5.7. Right to lodge a complaint: Data Subject is entitled to submit a complaint to the competent supervisory Authority (see section 1.12.) in case of a violation regarding the controlling of Personal data.
- 5.8. Right to remedy: Further the Data Subject is also entitled to bring an action against the Controller in front of the court in the event of a breach regarding personal data protection.
- 5.9. Right to object: Data subject shall have the right to object to the Personal data control based on Article 6 (1) e) or f) of GDPR at any time, including profiling based on the mentioned provisions.

6. Occurrence of Personal data breach

- 6.1. In the event of Personal data breach Controller shall notify the Authority without undue delay and, if possible, within 72 hours after becoming aware of the breach, unless the Personal data breach is not likely to pose a risk to the rights and freedoms of natural persons. If the notification does not happen within 72 hours, the cause for the delay must be attached as well.
- 6.2. The Data Processor shall notify the Controller of the Personal data breach without undue delay after becoming aware of the breach.
- 6.3. If the Personal data breach is likely to pose a high risk to the rights and freedoms of natural persons, the Controller shall, without undue delay, inform the Data subject of the Personal data breach.

7. Anonymous user IDs (cookies), data control for statistical purposes

- 7.1. The Webpage uses anonymous user IDs (cookies) to increase the quality of the use and to make the use of the Webpage easier for visitors. (An anonymous user ID - cookie - is a series of tokens suitable for unique computer identification and storage of profile information, which is placed on the User's computer by the service providers. The token itself cannot identify the User in any way, it is only

suitable for recognizing the computer.) If you prefer the anonymous user ID to not be placed on your computer, you can configure your browser so that it does not allow them to be placed. In this case, however, you may not be able to have access to some services or not in the form in which you allow the placement of anonymous user IDs.

7.2. The Foundation collects anonymous information and data on the Webpage for statistical purposes. This information relates to an unidentified or unidentifiable natural person and to personal data which have been anonymised in such a way that the data subject is either not identified or can no longer be identified. The provisions of GDPR does not cover the control of these information [see recital 26 of GDRP].

8. Data security measures

8.1. During managing documents, the access to each document and data shall be restricted to the persons listed in the last rows of the tables published in section 3.

8.2. Regarding physical data security, the Foundation ensures the proper closing and protection of its doors and windows. Only those who duly substantiate their legal interest may inspect the documents.

8.3. The premises in which data storage devices are placed have been designed by the Foundation in a way that they are suitable to provide sufficient security against unauthorized or violent intrusion, fire or natural disaster.

9. Assistance, comments, complaint handling

9.1. Assistance to the Data subject regarding data control and securing Personal data rights is provided by the person designated by the Foundation: László Lévai, office@bright-future.foundation

10. Right of amendment

10.1. The Foundation reserves the right to unilaterally amend the Privacy Policy by informing Data subjects on the Webpage or via e-mail. The Foundation shall publish the amended Privacy Policy on the Webpage on the tenth (10th) day before the amended Privacy Policy enters into force.

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