

# Privacy Policy Statement

## PRIVACY POLICY STATEMENT

In which we inform you as a Visitor of our website and User of our services about the data management and data protection regulations of our Foundation.

### 1. What are the principles of our data management?

Our Foundation follows the following principles in data management:

- your personal data will be legally and fairly treated, and will be treated transparently for you.
- personal data is collected only for specific, unambiguous and legitimate purposes and are not treated in a manner that is incompatible with the given purposes.
- the personal data collected and processed by us are relevant to the purposes they are collected for, and are limited to what is absolutely necessary.
- our Foundation makes every reasonable effort to ensure that the information we manage is accurate and up-to-date – in case necessary. Inaccurate personal data will be deleted or corrected immediately.
- we store your personal data in a form that you may be only identified for the duration of personal data management purposes.
- we provide adequate technical and organizational measures to ensure the proper security of personal data against unauthorized or unlawful handling, accidental loss, destruction or damage.

### Our Foundation ensures that your personal information

- will be collected, recorded, systematized, stored and used in your knowledge and with your voluntary consent and only to the utmost necessary measures and relevant to the purposes.
- will be used under contractual terms during the preparation- and conduction of the contract, and during and after the contractual period.
- in certain cases will be processed on legal basis, and in a compulsory manner. In such cases we will specifically remind you of this fact.
- will be managed according to the legitimate interest of the Foundation, or a third party i.e. for website-operational or developmental purposes or for security reasons.

### Who we are?

Our Foundation: **Karinthy Frigyes Gimnázium Stúdium Alapítvány**

Our foundation's headquarters: 1183., Budapest, Thököly u.7.

Our postal address: 1183., Budapest, Thököly u.7.

Our homepage: <https://karmun.hu/>

Contact: Salamon Attila

Our e-mail address: [ib@karinthy.hu](mailto:ib@karinthy.hu) (mailto:ib@karinthy.hu)

Tax number: **19664613-2-43**

Bank account number: **11784009-20300065**

Based on Article 37 of the GDPR, our Foundation is not obliged to appoint a Data Protection Officer.

Name of the activity	Data handled	Purpose of data management	Claim	Data transfer	Method and period of data storage
Issuing documents for accounting	Name Address (Taxation number, Bank Card number)	issuing invoices related to services delivered	GDPR Article 6. Paragraph (1) point c)	does not apply	Minimum 8 years
Accounting activities	Name Address (Taxation number, Bank Card number)	issuing invoices related to services delivered  preparing a balance	GDPR Article 6. Paragraph (1) point c)	does not apply	Minimum 8 years
Contact data	Name Phone number E-mail address	Setting and cancelling appointments	GDPR Article 6. Paragraph (1) point a)	does not apply	until the withdrawal of the consent, but no longer than 3 years
Tourist Tax	Name Address Place and Date of Birth	based on tax law		Tax Authorities	Minimum 8 years

Sending newsletters	Name, Nickname E-mail address Phone number	Reference, new services	GDPR Article 6. Paragraph (1) point a)		until the withdrawal of the consent, but no longer than 3 years
Order fulfillment	Name Phone number E-mail address Home- or delivery address	Fulfillment of orders, delivery of products	GDPR Article 6. Paragraph (1) point b)	Logistics Partner	5 years
Complaint-handling	Name Phone number E-mail address Home- or delivery address	Handling consumer complaints	GDPR Article 6. Paragraph (1) point c) Consumer Protection Act	Consumer Protection Referee Legal Counselor	5 years

Our Foundation uses the following data processors to handle the data in order to serve our customers at a high standard:

NAME	ADDRESS	ACTIVITY
Karinty Frigyes Gimnázium	1183., Budapest, Thököly u.7.	Data processing, web-hosting services
-	-	Accounting, Tax-consultancy services
Dienes Ádám	1183., Budapest, Thököly u.7.	Computer programming
Karinty Frigyes Gimnázium	1183., Budapest, Thököly u.7.	World-Wide Web portal Services

In case of any change in the list of our data processors, the changes will be followed by our Privacy Policy Statement.

Data we aim to manage:

Name of activity and purpose of data management	Claim	Data being handled	Period of time
<p>Visiting the website</p> <p>The aim is to ensure the proper and high quality operation of the website; to check and improve the quality of our services; and to identify malicious visitors who might attack our site; as well as to measure the number of visitors for statistical purposes.</p>	legitimate interest of our Foundation	<p>IP address</p> <p>the date of the visit</p> <p>the data of the site-pages visited,</p> <p>the type of operating system and browser you are using</p>	1 month
Contact Management fulfillment of the mission of the Foundation, extension of the network of contacts, informing visitors interested in the events	consent	<p>full name</p> <p>e-mail address</p> <p>phone number</p> <p>mailing address</p> <p>any other personal comment</p>	3 years in case of general information, or until withdrawal of consent
<p>Fundraising</p> <p>the purpose of donation: supporting student competitions, student events, sponsorship, publishing workbooks and other professional books</p>	consent	<p>full name</p> <p>e-mail address</p> <p>phone number</p> <p>mailing address</p> <p>other personal data (amount of the donation, method of payment)</p> <p>respectively any data specified in the tax laws (for taxation and tax benefit measures)</p>	15 years in case of donation, respectively any period specified by taxation and accounting laws. Or: until withdrawal of consent
<p>Administration, issuing complaints</p> <p>answering complaints</p> <p>The aim is to handle complaints in the smoothest manner</p>	legally binding	<p>full name</p> <p>e-mail address</p> <p>phone number</p> <p>mailing address</p> <p>any other personal comment</p>	based on relevant laws

<b>Customer- and Partner relationships</b> The aim is to organize and manage the events of our Foundation, book-publishing, maintenance of our client- and partner relationships, preparation and conduction of our contracts, management of our warranties	preparation and conduction of the contract, (in case of a natural person), legal obligation (in terms of billing)  the legitimate interest of our contractual partner (non-natural person in the case of our natural partners)	full name, position, contact data (e-mail address, phone number, etc.) necessary for the conduction of the contract, and invoicing (data according to the law)	5 years after the termination of the contract, or in the case of the representation of a natural person, five years after the termination of the representation. Any retention period specified in the taxation and accounting laws
<b>Creating and publishing interviews</b> on the website-, on the event related PR materials, and at any publications of the Karinthy High School and the Foundation. The aim is to create an interview with the participants at KARMUN and other Foundation events and to promote KARMUN and the Foundation.	consent	data shared during the interviews	not to be discarded, respectively, until the withdrawal of the consent.
<b>Shooting photos and videos and publishing them</b> on the website, in the PR related to events and in the publications of the Foundation. The aim is to capture the events and images of the participants for the posterity and to promote the KARMUN and the Foundation.	consent (not in the case of mass-shootings) or the legitimate interest of our Foundation (in case of mass-shootings)	photos, video shootings	not to be discarded, respectively, until the withdrawal of the consent.

Please note that certain details may also be processed after the withdrawal of the consent to fulfill our legal obligations or to enforce our legitimate interests (Article 7 paragraph (3) GDPR).

Should you have any questions about data handling, you may inquire for more information via our e-mail or postal address. We will send you our reply without delay, but latest within 30 days.

### 3. What are the cookies and how do we handle them?

Cookies are small data files (respectively: cookies) that are sent to your computer via our website during browsing on our site, in a way so that they are saved and stored by your web browser. Most of the frequently used web browsers (Chrome, Firefox, etc.) accept and allow downloading and using cookies by default, but it is up to you to modify your browser-settings to reject or disable them, or you can delete previously stored cookies from your computer. For further information on using cookies, see the "Help" feature of your browser.

There are cookies that do not require your prior consent. In such cases you will receive a brief notification from our website before starting your first visit. Such cookies can be the ones used for authentication, multimedia playing, load-balancing, and cookies to customize the user interface, and user-centered security.

As for cookies requiring your consent,- if the data is processed by visiting the site - our Foundation will inform you, and will ask for your consent at the start of the first visit.

Our Foundation does not use or allow cookies that authorize third parties to collect data without your consent.

Accepting the cookies is not mandatory but our Foundation holds no liability for any malfunctions of our website in the absence of cookies.

#### What types of cookies do we apply?

Type	Consent necessary	Description	Purpose	Validity
System cookies	not necessary	session identifier cookie	ensuring the functioning of the website	browsing session ends

Our website does not handle any cookies requiring consent.

Third party cookies can be found under the links below:

- <https://www.google.com/policies/technologies/types/> (<https://www.google.com/policies/technologies/types/>)
- <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=hu>
- <https://support.google.com/analytics/answer/6004245?hl=hu> (<https://support.google.com/analytics/answer/6004245?hl=hu>)

#### What is there still to be known about the data management on our site?

**Data of students under the age of 18 can only be handled with the consent of the person exercising parental supervision over the child!** For detailed information about data handling related to our events, please refer to [www.karmun.hu](http://www.karmun.hu).

By contracting our Foundation you voluntarily provide us with personal information. Therefore, since you are responsible for any data given, we ask you to extensively pay attention to the validity, correctness and accuracy of your information. Incorrect, inaccurate or incomplete data may be an obstacle to event-related activities or the conduction of the contract.

In case we need your consent to handle your personal data, you will be asked to attach a scanned version of the declaration of your consent to data handling during the registration or while filling in the detailed registration form. No data will be accepted in absence of the declaration.

If you do not provide personal information of your own but of another natural person, we assume that you are authorized to do so.

You may revoke your consent for data management free of charge at any time by withdrawing your consent to the handling of your personal data, or by requesting a restriction on your personal data.

For technical reasons we undertake the withdrawal of your consent by registration with a deadline of 8 workdays, however, please note that certain data may be processed even after the withdrawal of your consent so as to fulfill our legal obligations or to enforce our legitimate interests.

When using unauthorized personal data, or in case a visitor commits an offense or attacks our system, the personal data of the visitor will be deleted immediately and, if necessary, the data will be retained for the determination of liability or for the duration of a legal process.

### 5. Data management in relation to KARMUN events

**The data of participants of the KARMUN event series under the age of 18 can only be handled on the basis of the consent of the person exercising parental supervision over the child!** For detailed information about data handling related to our events, please refer to [www.karmun.hu](http://www.karmun.hu)

Name of activity and purpose of data management	Claim	Data being handled	Period of time
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<p><b>Data management of participating students</b> Registering personal data of students delegated to the event series by our contractual partners (schools)</p>	<p>consent (also by the person exercising parental supervision over a student under the age of 18)</p>	<p><b>name</b> <b>gender</b> <b>date of birth</b> <b>school represented</b> <b>phone number</b> <b>e-mail address</b> <b>languages spoken and its level</b> <b>MUN-experience</b> <b>year</b> <b>name of teacher accompanying</b> proof of parental rights (details in the contributing statement: parent's name, e-mail address, phone number)</p>	<p>5 years after the termination of the contract or 8 years in case of taxation legislation, or until the withdrawal of the consent  (the withdrawal of the consent shall not affect the eligibility of the data management processed until the withdrawal.)</p>
<p><b>Data management of participating students</b> participation at special events (Visitor's admission to the Parliament etc.) of students delegated to the series of events by our contractual partners (schools)</p>	<p>consent (also by the person exercising parental supervision over a student under the age of 18)</p>	<p><b>nationality</b> <b>passport number</b> <b>or</b> <b>ID number</b> proof of parental rights (details in the contributing statement: parent's name, e-mail address, phone number)</p>	<p>1 year after the end of the events, or any follow-up activities related to the events; or until the withdrawal of the consent</p>
<p><b>Data management of participating students</b> providing accommodation and catering (special data) for students delegated to the series of events by our contractual partners (schools)</p>	<p>consent (also by the person exercising parental supervision over a student under the age of 18)</p>	<p><b>health-related data (allergy, special diet, etc.)</b> proof of parental rights (details in the contributing statement: parent's name, e-mail address, phone number)</p>	<p>1 year after the end of the events, or any follow-up activities related to the events; or until the withdrawal of the consent</p>
<p><b>Data management of participating students</b> Data management of participating students requiring housing services (special data)</p>	<p>consent (also by the person exercising parental supervision over a student under the age of 18)</p>	<p><b>name</b> <b>age</b> <b>gender</b> <b>any other data shared in the introduction</b> <b>health-related data (allergy, special diet, etc.)</b> proof of parental rights (details in the contributing statement: parent's name, e-mail address, phone number)</p>	<p>1 year after the end of the events, or any follow-up activities related to the events; or until the withdrawal of the consent (the withdrawal of the consent shall not affect the eligibility of the data management processed until the withdrawal.)</p>
<p><b>Data management of participating students</b> Data management of participating students requiring housing services (special data)</p>	<p>consent (also by the person exercising parental supervision over a student under the age of 18)</p>	<p><b>name</b> <b>address</b> <b>contact data</b> <b>name of the parent,</b> <b>e-mail address,</b> <b>phone number</b> statement of consent to hosting exchange-students provided by the parents proof of parental rights (details in the contributing statement: parent's name, e-mail address, phone number)</p>	<p>1 year after the end of the events, or any follow-up activities related to the events; or until the withdrawal of the consent (the withdrawal of the consent shall not affect the eligibility of the data management processed until the withdrawal.)</p>
<p><b>MUN organisers (students)</b> <b>to appear on the website, and in the archives</b></p>	<p>consent (also by the person exercising parental supervision over a student under the age of 18)</p>	<p><b>name</b> <b>position undertaken</b> <b>photo</b></p>	<p>not to be discarded, respectively, until the withdrawal of the consent.</p>

<b>Data management of teachers accompanying participating students</b> Registering personal data of the school representatives delegated to the event series by our contractual partners (schools) for participation or for the execution of the events	legitimate interest of contractual partner	<b>name</b> <b>name of the school</b> <b>name of students accompanied</b> <b>languages spoken</b> <b>phone number</b> <b>e-mail address</b>	5 years after the termination of the contract or 8 years in case of taxation legislation, or until the withdrawal of the consent
<b>Data management of teachers accompanying participating students</b> Registering personal data of the school representatives delegated to the event series by our contractual partners (schools) for participation at special events (Visitor's admission to the Parliament etc.) <i>Data will be transferred to the Parliamentary Office</i>	legitimate interest of contractual partner	<b>name</b> <b>nationality</b> <b>passport or ID number</b>	1 year after the end of the events, or any follow-up activities related to the events; or until the withdrawal of the consent
<b>Data management of teachers accompanying participating students</b> Registering personal data of the school representatives delegated to the event series by our contractual partners (schools) for accommodation and catering purposes (special data)	consent	name data related to allergy, special diet, special habits (i.e. smoking) data related to accommodation (name of the accommodation, address, contact data)	1 year after the end of the events, or any follow-up activities related to the events; or until the withdrawal of the consent

**As a parent, you can cancel your consent to the management of your own or your child's personal data for free and at any time.** The withdrawal of the consent does not affect the legitimacy of the data managed with your previous consent, however, it may hinder the participation of your child at the KARMUN event.

For technical reasons we undertake the withdrawal of your consent by registration with a deadline of 8 workdays.

The handling of your personal information for the purposes mentioned in your consent must be terminated if:

1. the purpose for which the data was requested has been completed - unless you have given written consent to further process your data by indicating a new target,
2. according to your statement you do not intend to cooperate with our Foundation anymore.

If we need to terminate processing your data at any stage upon your request, you will not be held liable.

**As a teacher, you are attending a series of events as a representative of your school or as a supervisor responsible for the students under your supervision. Your personal information will be partially handled by the legitimate interest of your organization, and partially by your consent.** In case we manage your data based on your consent, you may cancel your consent free of charge and at any time as far as the organization of the event and the disclosure of the results is concerned. The withdrawal of the consent does not affect the legitimacy of the data managed with your previous consent.

For technical reasons we undertake the withdrawal of your consent by registration with a deadline of 8 workdays.

The handling of your personal information for the purposes mentioned in your consent must be terminated if:

1. the purpose for which the data was requested has been completed - unless you have given written consent to further process your data by indicating a new target,
2. according to your statement you do not intend to cooperate with our Foundation anymore.

If we need to terminate processing your data at any stage upon your request, you will not be held liable.

The details of the students and teachers participating in the event will be provided during the event:

- for host families for housing purposes
- the Parliament's Visitor Center (Parliament Office) to receive admission to enter to the Parliament

Transferring of any personal data other than in the cases mentioned above may only take place in case defined by law and/or with the consent of the person concerned.

#### **Other data management issues**

For our data processors, we stipulate contractual clauses to ensure that your personal information is not used for any purposes contrary to your consent. For more information on our data processors, see section 2.

Our Foundation may only transfer data abroad only on the basis of GDPR (Chapter V) and the relevant provisions of Information and Data Security Act.

Our Foundation may be contacted by the court, the prosecutor's office, and other authorities (e.g. police, tax office, National Privacy and Data Protection Authority) to provide them with information or documents. In these cases, we have to fulfill our reporting obligations, but only to the extent strictly necessary to achieve the purpose of the request.

Contributors participating in the data management of our Foundation are entitled to get acquainted with you and your child's personal data to a pre-determined extent - under the burden of full confidentiality.

We protect you and your child's personal data with appropriate technical and other measures, and ensure their security, availability, and we protect them from unauthorized access, alteration, damage, disclosure or any other unauthorized use.

Through organizational measures, we check physical access to these data in our buildings, we educate our agents, and train the organizers of the event, and we keep paper-based documents out of reach with adequate protection. We use encryption, password protection and anti-virus software as far as technical measures are concerned. However, we need to draw your attention to the fact that data transmission over the Internet can not be considered a fully secure method for data transfer. Our Foundation does its utmost to ensure that processes are highly secured, however, we can not take full responsibility for the transfer of data via our web site. Nevertheless, we strictly comply with regulations regarding any data received by our Foundation to ensure the protection of your and your child's data and to prevent them from unauthorized access.

#### **7. What are your rights and remedies available?**

**About our data management you may:**

- request information,
- request the correction, modification, extension of your data
- object to data handling and may request the deletion or limitation of your data (except for mandatory data handling)
- have legal remedies in front of a court,
- file a complaint with the authority of supervision, or initiate a procedure (<https://naih.hu/panaszuegyintezes-rendje.html>).

**Authority of Supervision: National Data Protection and Information Authority**

- Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
- Mailing Address: 1530 Budapest, Pf.: 5
- Phone: +36 (1) 391-1400
- Fax: +36 (1) 391-1410
- E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) (<mailto:ugyfelszolgalat@naih.hu>)
- Website: <https://naih.hu/>

At your request, we provide information about the following data of you or your child that is handled by us or that is handled by our authorized data-processors

- data,
- their source,
- the purpose and legal basis of data management,
- the length of time, - or if this is not possible to define - the criteria for determining this period,
- about the names, addresses of our data processors, and their data-related activities
- the circumstances and effects of any data-protection related incidents and our actions to prevent or to handle them
- In the case of transferring your personal data, the legal basis and the addressee of the transfer.

We may provide information about the above in the shortest possible time - but not later than within 30 days - from the submission of the request. We may provide information free of charge unless you have already submitted an information request for the same data field in the current year. We may refund your expenses if your data has been illegally treated or if your request for information has been corrected based on the information. The information can only be denied in legal cases by indicating the legal status and by providing information on the judicial remedy or the opportunity to appeal to the Authority.

Our Foundation will notify you and any other person - whom you may have transferred the data previously for management - about any correction, restriction, deletion of your personal data, unless the failure to notify does not violate your legitimate interest.

In case we fail to comply with your claim of the rectification, restriction or deletion of your personal data, we will inform you about the reasons for our refusal and we will inform you about the possibility to appeal to the Court and to the Authorities for legal remedy, within 30 days from the receipt of your request in written form, or electronically if you previously agreed to that.

Should you object to the processing of your personal information, your protest will be examined within the shortest possible time, but latest within 15 days from the submission of your request, and our decision will be communicated to you in written form. Should we admit that your protest is well-founded, we immediately terminate any activity related to the processing of your personal data, – including registration of any additional data, or data-transfer to a third party - and the data will be blocked, and any third parties involved in the data management will be informed that they are obliged to take action to enforce your right to protest.

We may refuse to comply with your request if we prove that data processing is justified by forceful legitimate reasons that prevail over your interests, rights or freedoms or which relate to the submission, enforcement, or defense of legal claims. If you do not agree with our decision or if we fail to comply with the 15-day notification period, you may contact the court within 30 days from the date of the decision or from the last day of the deadline.

The processing of data protection claims falls within the jurisdiction of the court, and the court may initiate proceedings in front of the court of domicile or residence of the person concerned. If you are of a foreign nationality, you may also apply to an authority of supervision at your usual place of residence or workplace.

**In order to resolve the issue in due time, we kindly ask you to contact our Foundation before contacting an authority of supervisory or the court with your complaint.**

**8. What are the applicable laws related to our activities?**

- Regulation (EU) 2016/679 of the European Parliament and of the European Council on the management of personal data of natural persons (GDPR)
- Act CXII of 2011 on the International Self-Determination and Freedom of Information; (Info Act.)
- Act C of 2003 on Electronic Communications (EC Act.)
- the CLXV 2013 Complaints and Notification of Public Interest Act. (FAs).
- Act V of 2013 on the Civil Code (Civil Code)

**9. Modification of the Privacy Policy**

Our Foundation reserves the right to modify the Privacy Policy Statement, about which any person involved will be informed properly. Information related to data management is published at <https://karmun.hu/>.

Budapest, 2018.