

## AJKC Digital PRIVACY POLICY

The purpose of this Privacy Policy document (hereinafter: **the Policy**) is to inform the data subject on the data collected on the data subject by **the Antall József Knowledge Centre of Political and Social Sciences Foundation** (registered seat: H-1093 Budapest, Czuczor utca 2.; registration number: 01-01-0010962; hereinafter: **AJKC**) while using its service called “AJKC Digital,” how such data are processed or used, and to whom these personal data are made available.

### 1. **Preamble**

The high-level protection of the personal data, in accordance with the provisions of Act CXII of 2011 on the freedom of information (hereinafter: **the Data Protection Act**) and the General Data Protection Regulation No (EU) 2016/679 of the European Parliament and the Council (hereinafter: **GDPR or the Regulation**) is of particular importance for AJKC.

In using the services provided by AJKC, processing data available to AJKC is a necessary and essential condition for using the “AJKC Digital” Service (hereinafter: **the Service**); in case of refusal or failure to provide such data, the Service cannot be used.

### 2. **Definitions**

**personal data:** means any specific data relating to an identified or identifiable natural person and any conclusion which may be drawn therefrom regarding the data subject. In the course of processing, personal data preserves such quality as far as its relationship with the subject may be restored. The relationship with the data subject may be restored if the controller has the technical conditions that are necessary for restoring.

**special data:** means personal data revealing racial or ethnic origin, political opinions, affiliation with a political party, religious or philosophical beliefs, or trade union membership, and the processing of data concerning one’s sex life, health or pathological addiction and criminal data.

**data subject:** any natural person who is identified or identifiable directly or indirectly based on specific personal data.

**processing:** any operation which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, storage, alteration, use, retrieval, disclosure by transmission, publication, alignment or combination, blocking, erasure or destruction, as well as hindering further use of the data, preparing pictures, audio and picture recordings and recording physical characteristics that are suitable for identifying the person.

**controller:** the natural or legal person, or entity not having legal personality which, alone or jointly with others, determines the purposes of the processing of personal data, makes the data processing decisions and enforces them or make them enforced by the processor.

**processing:** carrying out the technical tasks related to the processing activities.

**processor:** the person or organisation which processes the data under an agreement concluded with the controller, including any agreement concluded under a legal provision.

**data transfer:** making the data available to a specific third party.

**consent:** any freely given, specific, informed and unambiguous indication of the data subjects wishes by which they signify agreement to the processing of personal data relating to them for all or specific operations. Consent to processing special data shall be subject to a written form.

**proper information:** prior to data processing, the data subjects shall be informed whether the processing is based on their consent or is mandatory, furthermore, the data subjects must be informed clearly and in details about every fact related to the processing of their data, including in particular the purpose and legal basis of processing, the persons authorised to control and process data, the period of processing, and who has the right to access the data. The information should also cover the data subject’s rights in relation to data processing and the remedies available to them.

**objection:** the data subjects' statement by which they object to processing of their personal data and request termination of the processing or erasure of the data processed.

**data security:** system of technical and organisational solutions against the unauthorised acquisition, modification and destruction of the data.

**data erasure:** making the data unrecognisable in a manner that they may no longer be restored.

**data blocking:** attaching an identification mark to the data for the purpose of restricting their further processing permanently or for a given period.

**third country:** any state that is not a member of the European Economic Area.

### **3. Personal Scope of This Policy**

The Policy covers data subjects who wish to use the Service (registers or subscribes).

### **4. Processor**

For the purposes specified herein, AJKC acts as controller in respect of your personal data.

### **Antall József Knowledge Centre of Political and Social Sciences Foundation**

Registered Seat: H-1093 Budapest, Czuczor utca 2.

Registration Number: 01-01-0010962

Name of the Registering Court: Budapest-Capital Regional Court

Tax Number: 18024681-2-43

Phone Number: +36 20 310 8776

Email: ajtk@ajtk.hu

### **5. The Purpose and Legal Basis of Processing**

The processing within AJTK's activities is based on a freely given consent of the data subject, legitimate interest, and in order for AJKC to be able to fulfil its obligations. In case of processing based on a freely given consent, the data subjects may withdraw their consent in any phase of the processing. In certain cases, the processing, storage and transfer of a specific scope of the data provided is allowed by the law; we notify our client separately of such circumstance.

We hereby call the attention of those who disclose data to AKC that if they disclose personal data other than their own, they are obliged to obtain the data subject's consent.

Our data protection principles are in accordance with the applicable data protection laws, in particular with the Data Protection Act and the GDPR.

The purpose of processing falling under this Policy is provide the data subjects with the Service ordered and, in case of subscription, to inform the data subjects about the products and services of AJKC and its partners, forward their advertisements, carry out market research, as well as transfer information relating to AJKC's activities and services via electronic mail.

Legal basis for processing:

- **the data subject's voluntary consent** (with reference to data stated in Point 6.1. herein) that he or she is entitled to voluntarily withdraw at any point,
- **the performance of the agreement concluded with the data subject** (with reference to the data listed in Point 6.2. herein), and
- **the legitimate interest** connected to maintaining AJKC's business continuity (with reference to the data listed in Point a 6.3 herein)

### **6. The Scope of Data Processing**

For the purpose provided in Point 5 herein, AJKC processes the following personal data:

- 6.1.** Data to be provided by the data subject for the user profile when submitting the registration for the Service:

- Title
- Surname
- Given Name
- Date of Birth
- Email Address
- Institution
- Position
- Password

**6.2. Data processed in case of subscribing to the Service:**

- Data needed to issue the invoice (name, address, VAT number, method of payment, email address the invoice issued by AJKC shall be sent to)

**6.3. Data that might be processed by AJKC during the use of the Service:**

- Contact data such as address (ZIP code, place, address), telephone number, email address, web address

For the purposes provided herein, AJKC shall not process special data.

**7. Processing Period**

AJKC may process the disclosed personal data as long as the purpose exists, but no later than within the statutory deadline (for 8 years under the Accounting Act in case of data relating to invoices) or until withdrawal of the data subject's consent. Unless otherwise provided by law, AJKC retains your personal data during the effectiveness of its service agreement and until the civil law prescription (for 5 years in general) after termination of such agreement.

**8. Physical Data Storage Location and Security:**

AJKC may process personal data; that is, data which may be linked to you as follows: In connection with maintaining the Internet connection, the technical data relating to the computer, browser and Internet address used and the pages visited by the data subject are generated automatically in AJKC's computerised system. In addition, the data subject may also provide his/her name, contact details or other data if he/she wishes to contact AJKC personally during the use of the website.

The data recorded technically during system operation are the data of the data subjects' computers which are generated during registration and are recorded as automatic results of the technical processes by the system of Google Analytics. The system logs automatically the automatically recorded data upon entry and exit, without the data subjects' separate statement or action. This data together with other personal user data cannot be combined, with the binding exceptions provided by law.

Only AJKC may access the data provided. In addition to the cases stated herein, the personal data shall not be transferred to third parties. The personal data provided may be accessed only by colleagues of AJKC for whom knowing the personal data is essential in order to achieve the purpose of processing.

In order to ensure the security of the personal data processed, AJKC shall take the technical and organisational measures and set the procedural rules that are necessary to enforce the Hungarian and EU data protection laws.

AJTK protects the personal data processed against unauthorised access, alteration, transfer, disclosure to the public, erasure or destruction, as well as incidental destruction and damage.

**9. General Provisions**

If AJKC wishes to perform further processing, it shall provide prior information on the material circumstances of the processing (the legal background of processing and the legal basis thereof, the purpose of processing, the scope of data processed, the period of processing).

Please note that the Controller shall satisfy the written data requests submitted by the authorities based on the law. Controller shall keep records of data transfers in accordance with Section 15(2) to (3) of the Data Protection Act (to which authority, what personal data, on what legal basis, when was transferred by the Controller); Controller shall provide information on the content of such records upon request unless this is excluded by the Act.

If your personal data change during the effectiveness of the agreement applicable to the relevant Service, AJKC shall immediately be informed of such change.

### **10. Data Processors**

During the processing described herein, AJKC may transfer your personal data to the following processors:

<b>Processor's name and contact details</b>	<b>Services provided by the processor</b>	<b>Scope of the data transferred to the processor</b>	<b>Processing period</b>
WP Online Magyarország Kft. 1053 Budapest, Ferenciek tere 7-8.	data recording, server supply, mailing, delivery, ensuring the technical background, marketing.	full scope of the data specified in Point 6 herein.	The period of the service contract until erasure of the personal data (withdrawal) or the civil law prescription unless otherwise provided by law.
Ag. Mamas Kft. 1133, Budapest, Árbóc utca 6. 2 <sup>nd</sup> floor.	bookkeeping tasks connected to invoicing.	full scope of the data specified in Point 6 herein.	The period of the service contract until erasure of the personal data (withdrawal) or the civil law prescription unless otherwise provided by law.
Sasvár-kincs Kft. 1085 Budapest, Üllői út 16/B. 2 <sup>nd</sup> floor. 11.	auditing tasks connected to invoicing.	full scope of the data specified in Point 6 herein.	The period of the service contract until erasure of the personal data (withdrawal) or the civil law prescription unless otherwise provided by law.
Aquilla & Ascella Kft. 2051 Biatorbágy, Iharos 8804 hrsz.	supervision of bookkeeping.	full scope of the data specified in Point 6 herein.	The period of the service contract until erasure of the personal data (withdrawal) or the civil law prescription unless otherwise provided by law.
Intellectum Kft. 1085 Budapest, Üllői út 16/B. 2 <sup>nd</sup> floor. 11.	preparation of financial settlements and reporting.	full scope of the data specified in Point 6 herein.	The period of the service contract until erasure of the personal data (withdrawal) or the civil law prescription unless otherwise provided by law.

If processing is carried out by another person in AJKC's name, such controller may only involve processors who or which provide appropriate safeguards for implementing the appropriate technical and organisation measures which ensure compliance with the requirements set out in the GDPR.

## **11. Direct Marketing**

### **11.1. Sending Newsletters**

AJKC sends a newsletter to its clients and other business partners and interested parties who are in contact with it, based on their prior, freely given, specific and clear consent and record the abovementioned data for such purpose.

### **11.2. Sending Materials Related to the Professional Activities of AJKC**

AJKC organises professional events regularly for the clients and other business partners and invitees who are in contact therewith. AJKC sends invitations and aids based on data subjects' prior, freely given, specific and clear consent, and processes and records the abovementioned data for such purpose.

In addition, AJKC sends out separate newsletters to the business partners and invitees mentioned above specifically designed to inform them about its latest research results. Such newsletters are also sent out based on the data subjects' prior, freely given, specific and clear consent and the data are processed and recorded by AJKC for such purpose.

## **12. Rights of Data Subjects**

### **12.1. Data Subjects' Rights and Remedies in Relation to Data Processing**

Data subjects shall have the following rights:

- a) request information on processing of their personal data;
- b) request rectification of their personal data;
- c) request erasure or restriction of their personal data;
- d) avail of their right to data portability;
- e) object to the processing of their personal data;
- f) turn to AJKC, the data protection supervisory authority, or court when their rights are breached.

### **12.2. Right of Access of the Data Subjects**

Data subjects may request a feedback on whether their personal data are being processed. If any such processing is ongoing, data subjects may request information about it:

- a) the purpose of processing;
- b) categories of the personal data concerned;
- c) who may get to know the personal data, including in particular whether they are transferred to a third country;
- d) the period of processing, or, if that is not possible, the criteria used to determine that period;
- e) their right to request from the controller rectification or erasure of personal data or restriction of processing personal data concerning them or to object to processing of such personal data;
- f) the right to lodge a complaint with a data protection supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, at least in these cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

### **12.3. Right to Rectification**

At the data subjects' request, AJKC shall rectify, without delay, the inaccurate personal data concerning such data subjects or, taking into account the purpose of processing, they may request the integration of incomplete personal data amongst others through an additional statement.

### **12.4. Right to Erasure (Right to Be Forgotten)**

Data subjects shall have the right to obtain from the controller the erasure of personal data concerning them without undue delay and the controller shall have the obligation to erase personal data without undue delay where:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) data subjects withdraw their consent underlying the processing and there is no other legal ground for the processing;
- c) data subjects object to the processing and there are no legitimate overriding reasons for processing;

- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in EU or Member State law to which the controller is subject;
- f) personal data are collected directly in relation to information society services offered for children.

The right to erasure cannot be enforced, if the processing is necessary

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation under EU or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

Where the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

### **12.5. Right to Restriction of Processing**

Data subjects shall be entitled to restrict the processing in the following cases:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) AJKC no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

### **12.6. Right to Data Portability**

Data subjects shall have the right to request receipt of the personal data provided to AJKC in a structured, commonly used and machine-readable format and have the right to transfer those data to another controller or to make AJKC transfer them directly to another controller.

### **12.7. Right to Object**

Data subjects shall be entitled to object, on grounds relating to their particular situation, at any time to processing of their personal data by AJKC based on legitimate interests or in connection with profiling. AJTK shall no longer process the personal data unless it demonstrates 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.

### **12.8. Legal Remedies**

Data subjects shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their respective habitual residence, place of work or place of the alleged infringement, if the data subjects consider that the processing of personal data relating to them infringes the Regulation. (National Authority for Data Protection and Freedom of Information; H-1055 Budapest, Falk Miksa utca 9-11; postal address: H-1374 Budapest, Pf.: 603. email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)). The supervisory authority shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy. We propose that you avail of your right to object and file a complaint to AJTK before initiating the procedure of any authority or court. In connection with the exercise of your rights, you may act as follows before AJKC:

- by mail sent to AJKC's registered seat or postal address
- in the form of an electronic letter sent to [digitalistudastar@ajtk.hu](mailto:digitalistudastar@ajtk.hu), or
- personally, at AJKC's registered seat in working hours: Monday-Friday, 9am-5pm.

Data subjects may turn to court against AJKC or, in connection with the processing operations falling within the processor's scope of activities, against the processor if they consider that AJKC or the processor engaged by it or acting on its instructions processes their personal data in breach of the provisions on personal data processing, set out by law

and in the binding legal acts of the European Union. Data subjects may initiate litigation also before the regional court of their domicile or residence, according to their own choice. The court acts in such case out of turn.

### **13. Other Provisions**

We provide information on processing operations that are not listed herein upon recording of such data. We hereby inform our clients that, based on an authorisation received from court, the prosecutor, investigating authority, the authority dealing with administrative offences, the administrative authority, the National Authority for Data Protection and Freedom of Information, the National Bank of Hungary or, by law, other bodies may request the controller to give information, disclose and transfer data, or to make documents available. AJKC discloses to the authorities only the personal data that is essential for achieving the purpose of the request and only to the extent necessary therefor, provided that such authority has indicated the exact purpose and the scope of data sought.

### **14. Amendment of This Policy**

Within the limits set by law, AJKC may amend the Policy from time to time to make it compliant with the changes in AJKC's legal obligations and activities regarding the processing of the data subjects' personal data. Please control regularly the validity of the Policy in order to learn about any changes.

The last amendment to this Policy was made on 16 October 2020.

**Antall József Knowledge Centre of Political and  
Social Sciences Foundation  
(AJKC)**