

DATA PROTECTION AND DATA MANAGEMENT POLICY

I. INTRODUCTION

This data protection and data management policy ("Policy") applies to personal data voluntarily provided by visitors through subscription for newsletters on the websites operated by the Bálint Jewish Community House Foundation (Headquarters: 1065 Budapest, Révay u. 16, Tax number: 18176018-2-42, hereinafter referred to as "Foundation") at <http://www.balinhaz.hu>, <http://www.judafest.org>, <http://www.zsifi.org>, <http://www.satorfeszt.hu>, <http://www.globaldayofjewishlearning.hu>, <http://www.hanukatalizator.hu> ("Website"). It outlines the rights and obligations related to this data, as well as other significant provisions. The collection and management of personal data uploaded to the Website comply with directly applicable European Union regulations and current Hungarian laws, particularly EU Regulation 2016/679, the General Data Protection Regulation ("GDPR"), the 2011 Information Act on the Right of Informational Self-Determination and on Freedom of Information, the 2008 Act on Basic Conditions and Certain Restrictions of Economic Advertising Activities ("Grt"), and the recommendations and data protection practices established by the National Authority for Data Protection and Freedom of Information ("NAIH").

II. DEFINITIONS

The following definitions are established based on the Information Act:

1. Personal data: Data that can be associated with the "user" including the user's name, identifiers, and one or more characteristics of physical, physiological, mental, economic, cultural, or social identity, and any conclusion drawn from the data about the user that does not constitute a public interest or publicly accessible data. Personal data includes, among others, name, address, and email address.
2. Consent: The user's voluntary and definitive expression of will, based on adequate information, by which they unequivocally agree to the processing of their personal data, either in full or limited to specific operations.
3. Objection: The user's statement by which they object to the processing of their personal data, requesting the termination of data processing or deletion of processed data.
4. Data controller: The natural or legal person, or organization with legal personality (like the Foundation), who or which alone or jointly determines the purposes of data processing, makes decisions about data processing (including the means) and executes them, or has them executed through a processor.
5. Data processing: Any operation or set of operations performed on data, regardless of the process applied, especially collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, and preventing further use of data, including taking photos, sound or image recordings, as well as capturing physical identifiers (e.g., fingerprint, palm print, DNA sample, iris image) suitable for identifying the person.

III. PRINCIPLES OF DATA MANAGEMENT

The Foundation only processes personal data necessary for sending newsletters, making purchases through its webshop, or making donations via the Website. The Website can be visited by anyone, and the Foundation does not collect or manage data about visitors unless they register on the Website. However, using the newsletter service, making purchases in the webshop, and donating through the Website require registration on the Website, during which the following data must be mandatorily provided:

- Name
- Email address
- Time of registration

IV. PURPOSE OF DATA MANAGEMENT

Purpose of data management: sending newsletters to registered users, mapping the interest in the Foundation's services, and/or using the webshop, donating.

Duration of data management: begins with registration and ends with its deletion, or until the purpose of data management is achieved, or other legally specified time limits.

Legal basis of data management: the consent of the person concerned with registration. Subscription to the newsletter is done by accepting a separate point.

V. DATA TRANSMISSION, DATA PROCESSING

The personal data provided during registration will not be transmitted to third parties without the prior consent of the user, except where required by law. The Foundation may employ data processing services to manage personal data, which must adhere to this Policy, applicable laws, and the contract regulating the relationship with the Foundation.

VI. ANONYMOUS DATA AND "COOKIES"

The Foundation mostly collects anonymous information from the Website, such as searches. When a visitor accesses the Website, the Foundation does not collect any personal data until the visitor authorizes it. The Foundation processes anonymous information to improve and perfect the content of the site. This involves implementing "cookies," which collect the visitor's top-level domain name, access date, and time. Cookies, by themselves, cannot identify the visitor. Cookies are sent to the visitor's browser program and stored on the computer's hard drive. Cookies

do not damage the visitor's computer. The browser can be set to notify when a cookie is received, allowing the visitor to decide whether to accept it.

VII. REMEDIAL RIGHTS

The registered user can obtain information about their data processed by the Foundation or its appointed data processors, the purpose of data management, its legal basis, its duration, the name and address (headquarters) of the data processor, and the data management-related activities, and who has received or will receive the data and for what purpose. The Foundation, as a data controller, will provide this information in writing and in a comprehensible form as soon as possible, but no later than 30 calendar days from the receipt of the request. The provision of information is free of charge if the requester has not submitted a similar information request to the Foundation within the current year. Otherwise, the Foundation may charge a cost.

The Foundation will immediately delete personal data if (i) the registered user indicates this in writing via an electronic mail sent to GDPR@balinthaz.hu or by a declaration sent to and received at the Foundation's headquarters; (ii) if the processing is unlawful; (iii) the purpose of data processing has ceased; or (iv) the legally specified storage period has expired, as ordered by the court or the NAIH.

The Foundation will inform the affected registered user about the correction and deletion of data via email, unless it is unnecessary considering the purpose of data processing, and it does not infringe on the legitimate interest of the affected user.

The registered user may object to the processing of their personal data if:

- The processing of personal data is solely necessary to enforce the legal right or legitimate interest of the data controller, except where data processing is mandated by law;
- The personal data is used for direct marketing, public opinion polling, or scientific research;
- The law otherwise allows the exercise of the right to object.

Upon filing an objection, the Foundation will suspend the data processing and will review the objection without delay, but no later than 15 calendar days, and inform the user in writing of the result. If the objection is justified, the Foundation will cease the data processing.

If the affected user disagrees with the decision of the Foundation, they may appeal to the court or to the NAIH (Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C., Website: <http://www.naih.hu>) within 30 calendar days from the notification of the decision.

The Foundation cannot delete the user's data if the data processing is mandated by law. If the user's rights are violated, they can take legal action against the data controller. The court will expedite these cases.

The Foundation reserves the right to amend this Policy or to modify it appropriately in response to changes in EU or Hungarian law.

This Policy is effective as of April 24, 2020.