

PRIVACY POLICY

MEMBERS, CONTRACTUAL PARTNERS
PARTICIPANTS IN EUROPEAN UNION PROJECTS
for natural persons acting on their behalf
for WEBSITE VISITORS
for NEWSLETTER SUBSCRIBERS
for natural persons who are prospective employees
for Employees

THE CONTROLLER

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Represented by: Dr Balázs Vinnai, President

Legislation and definitions forming the basis for processing

- Regulation (EU) 2016/679 of the European Parliament and of the Council 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 or GDPR).
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information

Under the GDPR, "**personal data**" means any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The term "**recipient**" means a natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Availability of the Privacy Policy

This Policy is available at: <https://ivsz.hu/adatvedelem/>. The Controller reserves the right to amend this Policy unilaterally with effect for the future. Data Subjects will be informed of amendments at the above address.

PERSONAL DATA

purpose processing: 1	of	Keeping records for contact purposes in order to ensure the availability of the contact details of persons acting on behalf of Members and contractual partners, and of their employees and officers. Recording, storage, use and deletion.
data categories:	and	Persons acting on behalf of Members and contractual partners name, place of work, position and contact details
duration processing:	of	15 years (as a general rule) following termination of the legal relationship
source:		Directly from the Data Subject or another controller
legal basis for processing:		The Controller's legitimate interest You may notify us at any time that you no longer wish us to process your contact details; see the Right to object section under Your Rights in this Policy.

purpose processing: 2	of	Processing (recording, storage, use and deletion) of personal data appearing in documents when keeping records of documents (contracts, invoices, minutes, other documents, etc.), for the purpose of complying with statutory obligations governing the preparation and performance of contracts concluded with the Company.
data categories:	and	Personal data of persons acting on behalf of contractual partners appearing in contracts, invoices, other contractual documents or emails
duration processing:	of	Up to 8 years following termination of the legal relationship
source:		Directly from the Data Subject or another controller
legal basis for processing:		Performance of a contract, compliance with a legal obligation, legitimate interest

purpose processing: 3	of	Storage, use and deletion of data and statements within the limitation period for the enforcement of claims arising from civil-law or employment-law relationships and for defence against claims. Full retention of data and documents.
data categories:	and	The data specified under processing purpose 2 above.
duration processing:	of	5 years (as a general rule) following termination of the legal relationship
source:		Directly from the Data Subject or another controller
legal basis for processing:		Legitimate interest

purpose processing: 4	of	For the purpose of fulfilling obligations relating to European Union and other government projects, carrying out the processing operations required by the legislation, contracts and other mandatory documents governing the project (recording, storage, use and deletion), and complying with the necessary OTR data-reporting obligation under the so-called de minimis rules (data transfer).
data categories:	and	Name, place of work, position, email address, telephone number
duration processing:	of	For the period specified in the legislation on which the processing activity is based.
source:		Directly from the Data Subject or another controller
legal basis for processing:		Compliance with a legal obligation
recipient:		The personal data are transferred to the body designated in the legislation on which the processing activity is based, for the purpose of complying with the legal obligation.

purpose processing: 5	of	Processing of user data relating to online presence for the purpose of personalising and improving the www.ivsz.hu website See also the "Processing of technical data and cookies" section below in this Policy.
data categories:	and	Session configuration. Consent-recording cookie. IP address, browser type, language used, application ID, crash data
duration processing:	of	Session configuration: until the end of the browsing session. Consent-recording cookie: 1 year
source:		Directly from the Data Subject
legal basis for processing:		Consent On the www.ivsz.hu website, by using the "Save settings" button in the COOKIE SETTINGS window, you consent to the processing of the above (technical) personal data. Providing personal data is at your discretion; however, if any data are not provided, the service cannot be guaranteed to be delivered at an appropriate level of quality. You may withdraw your consent at any time; however, this does not affect the lawfulness of processing carried out before its withdrawal. The Controller must interpret an incomplete, contradictory or unintelligible selection as a refusal of consent.

purpose processing: 6	of	Sending newsletters. Maintaining customer relations; sending policies, information and offers to Members, representatives of legal persons participating in existing projects (who are not Members), and natural persons who previously initiated contact.
data categories:	and	Name, place of work, position, contact details
duration processing:	of	Until consent is withdrawn or an objection is made; for three years following termination of membership or the project
source:		Directly from the Data Subject or another controller
legal basis for processing:		Consent On the www.ivs.hu website, by ticking the checkbox provided specifically for this purpose in the NEWSLETTER window, you consent to the processing of the above personal data for the purpose of sending newsletters. Providing personal data is at your discretion; however, if any data are not provided, the service cannot be guaranteed to be delivered at an appropriate level of quality. You may withdraw your consent at any time; however, this does not affect the lawfulness of processing carried out before its withdrawal. The Controller must interpret an incomplete, contradictory or unintelligible selection as a refusal of consent. For Members, the Controller's legitimate interest You may notify us at any time that you no longer wish us to process, for the purpose of sending newsletters, the contact details of the legal person represented by you that is a Member; see the Right to object section under Your Rights in this Policy.

purpose processing: 7	of	Assessing whether an applicant for a vacant position can be employed and, if suitable, establishing an employment relationship; using, storing and deleting data for recruitment, preparing an offer and preparing an employment contract.
data categories:	and	Name, place and date of birth, home address, email address, telephone number, data concerning education, data concerning employment history, data concerning knowledge of foreign languages. Other information typically included in a curriculum vitae, e.g. publications, professional recognition and references. Information concerning reduced capacity for work, leisure activities and a photograph.
duration processing:	of	3 months following the decision concerning the employment relationship.
source:		Directly from the Data Subject
legal basis for processing:		Consent During your application, by completing the CONSENT FORM provided by the Controller or by making an express statement of equivalent content, you consent to the processing of the above personal data for recruitment purposes. Providing personal data is at your discretion; however, if any data are not provided, the Controller cannot conduct the recruitment process. You may withdraw your consent at any time; however, this does not affect the lawfulness of processing carried out before its withdrawal. The Controller must interpret an incomplete, contradictory or unintelligible indication as a refusal of consent.

purpose processing: 8	of	Establishing, maintaining, performing and terminating the employment relationship, and exercising the employer's rights and fulfilling its obligations; Selecting applicants, concluding the employment contract, payroll processing, recording working time and allocating tasks; Tax and contribution returns, social security tasks and compliance with occupational safety requirements; Providing, protecting and monitoring the employer's equipment (for example, company telephone, email account and laptop);
data categories:	and	Name, place and date of birth, home address, email address, telephone number, data concerning education, data concerning employment history, data concerning knowledge of foreign languages. Other information typically included in a curriculum vitae, e.g. publications, professional recognition and references. Information concerning reduced capacity for work, leisure activities and a photograph. The content of the (company) email account owned by the employer. The employer is not entitled to conduct private correspondence through the company email address.
duration processing:	of	For data processed on the basis of compliance with a legal obligation, for the period required by law. Where processing is necessary for the performance of a contract, for up to 3 months following termination of the contract, unless a longer period of processing is justified by compliance with a legal obligation or the enforcement of a claim Where processing is based on legitimate interests, for 3 months following the decision concerning the existence of the legitimate interest
source:		Directly from the Data Subject or another controller
legal basis for processing:		Compliance with a legal obligation (Article 6(1)(c) of the GDPR) Performance of a contract (Article 6(1)(b) of the GDPR) Processing based on legitimate interests (Article 6(1)(f) of the GDPR): in certain cases (e.g. protection of property, CCTV surveillance, access-control systems, protection of trade secrets).

WHO MAY ACCESS YOUR PERSONAL DATA?

As a general rule, your personal data may be accessed by the Controller's employees in order to perform their duties, for example by the Controller's staff for case management purposes. Personal data are transferred to the recipients identified in the relevant **recipient** entry (under this Policy, only for the processing purpose relating to European Union projects). For the processing of your personal data, the Controller uses the services of the following **Processors**:

- **Accountant:** A-Kontir Kft. (www.a-kontir.hu)
- **Website operator/developer:** Hidden Design Kft. (www.hidden.hu), Done Digital Kft. (www.thisisdone.com)
- **Payment service provider:** www.bilingo.hu
- **Invoicing system provider:** www.bilingo.hu, www.szamlazz.hu
- **IT service provider / hosting provider:** Microsoft Magyarország Kft. (www.microsoft.com), DotRoll Kft. (www.dotroll.com)
- **Email distribution system provider:** www.hubspot.com

The Controller transfers the Data Subject's personal data to other public authorities only for mandatory data transfers under tax and financial legislation or in other cases required by law, for example where documents containing the Data Subject's personal data must be provided to a court or the police. In addition, the lawyer providing legal representation to the Controller may access personal data if a legal dispute arises between the Data Subject and the Controller. The undertaking providing accounting services to the Controller may access data processed for invoicing purposes.

DATA SECURITY MEASURES

The Controller uses appropriate information-security measures to protect your personal data against, among other things, unauthorised access, unauthorised alteration, unauthorised copying or disclosure. Through appropriate organisational measures, the Controller ensures that personal data do not become accessible to an indefinite number of persons: in the case of electronic processing, appropriate allocation of access rights, a firewall, encryption and physical protection of hardware.

Processing of technical data and cookies:

Natural persons may be associated with online identifiers provided by the devices, applications, tools and protocols they use, such as IP addresses and cookie identifiers. When combined with other information, these data may be suitable for and used to create profiles of natural persons and identify the person concerned.

Cookies can also remember settings, so users do not have to enter them again when they move to a new page; they remember data previously entered, so it does not have to be typed again. Cookies analyse use of the website so that improvements made using the information obtained enable it to operate as closely as possible in line with user expectations, allow the user to find the information sought easily, and monitor the effectiveness of our advertisements.

Where the Controller displays various content on the website using external web services, this may result in the storage of certain cookies that are not controlled by the Controller, and it therefore has no influence over what data those websites or external domains collect. Information on those cookies is provided in the policies governing the relevant service. Users can configure their web browser to accept all cookies, reject all cookies, or notify them when a cookie is sent to their computer. The relevant options are generally found in the browser's "Options" or "Settings" menu. The detailed information available on the English-language website www.allaboutcookies.org also provides assistance with settings in different browsers.

Cookies used by the <https://www.ivs.hu> website:

Session cookie: These are essential for navigating our website, operating its key functions and accessing protected content. These cookies store information required to complete forms and, in some cases, the language you select. They do not collect information about you that could identify you, be used for marketing purposes, or remember which other websites you have visited. When the website is closed, these cookies are automatically deleted and the session ends.

Functional cookie: To improve the user experience, these cookies detect the device used to open our website and remember your previous choices (such as your username, password, selected language, region, whether you logged in during an earlier session, and user changes you made to text size, font or other customisable elements of the website). This enables us to offer you better and more personalised functions. These cookies do not track your activity on other websites and we do not use them to send you advertisements through other sites.

Cookies used by Google Analytics: Google Analytics is Google's analytics tool, which helps website and application owners obtain a more accurate picture of their visitors' activities. The service may use cookies to collect information and compile reports from statistical data on website use without individually identifying visitors to Google. The main cookie used by Google Analytics is the "__ga" cookie. Google also uses several other cookies. In addition to reports based on website usage statistics, Google Analytics may be used to display more relevant advertisements in Google products (for example, Google Search) and across the internet on the basis of the following information: time spent on the site; type and version of browser used; the device's operating system; geographical location based on the IP address; and the website visitor's internet service provider. Google Analytics is operated by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland).

Other analytics services used on www.ivs.hu: Hotjar, Smartlook, Hubspot.

Embedded profiles from third-party websites: Facebook, Instagram, LinkedIn, YouTube. When embedded, these social plug-ins do not store personal data. If you navigate to those sites, the third parties become controllers in accordance with the privacy policies available there (www.meta.com; www.microsoft.com).

The Controller does not transfer personal data covered by this Policy to an international organisation. The Processors' current policies provide guidance regarding processing outside the EU.

The Controller does not use automated decision-making.

1. Rights relating to processing

The Data Subject may request the following from the Controller:

- information on the processing of their personal data (before processing begins and during processing),
- access to their personal data (the Controller making their personal data available to them),
- rectification and completion of their personal data,
- erasure or restriction (blocking) of their personal data - except for mandatory processing,
- the right to data portability,
- the right to object to the processing of their personal data (opt out) if the processing is based on the legitimate interests of the Controller or a third party (or if it is carried out in the public interest or in the exercise of official authority),
- withdrawal of their consent if the processing is based on consent.

The Data Subject may submit a data subject request to the Controller in accordance with section 2. The Controller will comply with the Data Subject's lawful request no later than one month after receipt and will notify the Data Subject by letter sent to the contact details provided by them.

1.1. Right to request information (based on the Controller's obligations under Articles 13 and 14 of the GDPR)

In accordance with section 2, the Data Subject may request information from the Controller as to:

- which of their personal data are processed,
- the legal basis on which they are processed,
- the purpose for which they are processed,
- the source from which they originate,
- how long they are processed,
- whether a Processor is used and, if so, the name and address of any Processor and its activity relating to the processing,
- to whom, when, under which legal provision, and with regard to which of their personal data the Controller has granted access, or to whom the Controller has disclosed or will disclose their personal data, in particular to recipients in third countries or international organisations,
- the circumstances and effects of any personal data breach and the measures taken to remedy it.

1.2. Right of access (under Article 15 of the GDPR)

The Data Subject has the right to obtain confirmation from the Controller as to whether or not their personal data are being processed and, where such processing is taking place, has the right to access the personal data being processed; this may be requested from the Controller in accordance with section 2.

The Controller will provide the Data Subject with a copy of the personal data undergoing processing, provided that this is not precluded by another legal provision. Where the Data Subject submitted the request electronically, the information must be provided in a commonly used electronic format, unless the Data Subject requests otherwise. For any further copies requested by the Data Subject, the Controller may charge a reasonable fee based on administrative costs. The right to obtain a copy must not adversely affect the rights and freedoms of others.

1.3. Right to rectification and completion (under Article 16 of the GDPR)

In accordance with section 2, the Data Subject may request that the Controller amend any of their personal data (for example, they may change their email address or postal contact details at any time, or request that the Controller rectify without undue delay any inaccurate personal data processed by the Controller).

Taking into account the purpose of the processing, the Data Subject has the right to request the appropriate completion of incomplete personal data processed by the Controller.

1.4. Right to erasure (under Article 17 of the GDPR)

The Data Subject may request the erasure of their personal data from the Controller in accordance with section 2.

As a general rule, erasure of personal data may be requested where our processing is based solely on your consent; in such a case, we will erase your personal data.

Restriction of the Data Subject's right to erasure may occur only where one of the following exceptions set out in the GDPR applies; that is, where any of those grounds applies, continued retention of the personal data may be regarded as lawful:

- a) for exercising the right to freedom of expression and information; or
- b) for compliance with a legal obligation; or
- c) for the performance of a task carried out in the public interest; or
- d) for the exercise of official authority vested in the Controller; or
- e) for reasons of public interest in the area of public health;
- f) for archiving purposes in the public interest; or
- g) for scientific or historical research purposes or statistical purposes; or

where necessary for the establishment, exercise or defence of legal claims.

1.5. Right to blocking (restriction of processing) (under Article 18 of the GDPR)

In accordance with section 2, the Data Subject may request that the Controller block their personal data (by clearly marking the restricted nature of the processing and ensuring that the data are handled separately from other data).

The blocking will remain in place for as long as the reason specified by the Data Subject makes it necessary to retain the data.

The Data Subject may request that data be blocked, for example, if they believe that the Controller handled their report unlawfully but it is necessary, for the purposes of administrative or court proceedings initiated by them, for the Controller not to erase the report.

In that case, the Controller will continue to retain the personal data (for example, the report concerned) until contacted by the authority or the court, after which it will erase the data.

Where processing has been restricted, such personal data may, with the exception of storage, be processed only with the Data Subject's consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

1.6. Right to data portability (under Article 20 of the GDPR)

In accordance with section 2, the Data Subject may request that the personal data concerning them which they have provided to the Controller be provided to them in a structured, commonly used and machine-readable format, and is entitled to transmit those data to another controller without hindrance from the Controller, where:

- a) the processing is based on the Data Subject's consent or on the performance of a contract concluded with the Data Subject;
- b) and the processing is carried out by automated means.

The right to data portability must not adversely affect the rights and freedoms of others.

1.7. Right to object (under Article 21 of the GDPR)

On grounds relating to your particular situation, **you have the right at any time to object to the processing of your personal data based on the legitimate interests of the controller (or of a third party), or for direct marketing (direct solicitation) purposes.** In that case, the controller may continue to process the personal data only if it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or grounds relating to the establishment, exercise or defence of legal claims. Where personal data are processed for scientific or historical research purposes or statistical purposes, you have the right, on grounds relating to your particular situation, to object to the processing of personal data concerning you, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

1.8. Rights relating to profiling:

The Controller does not use automated decision-making or decision-making based on profiling.

2. Options for asserting rights and seeking remedies in connection with processing

Contacting the Controller

Before initiating court or administrative proceedings, we recommend that you send the Controller your enquiry or complaint concerning the processing of your personal data, so that we can investigate it and provide a satisfactory remedy, and, where justified, comply with any request or claim under section 1.

Where the Data Subject seeks to exercise any right relating to processing under section 1, requests information relating to processing, or objects or complains in relation to processing, the Controller will investigate the matter without undue delay and within the period prescribed by the legislation in force at the relevant time, take action on the request, and provide the Data Subject with information on the matter. Where necessary, taking into account the complexity and number of requests, this period may be extended as provided by law.

If the Data Subject submitted the enquiry electronically, we will provide the information electronically where possible, unless the Data Subject requests otherwise. If the Controller does not take action on the Data Subject's enquiry, it will inform the Data Subject without delay and at the latest within the period specified by law of the reasons for not taking action and for refusing the request, and that the Data Subject may initiate court or administrative proceedings in the matter as set out below.

To exercise your rights relating to processing, or if you have any questions or doubts concerning data processed by the Controller, wish to request information concerning your data, submit a complaint, or exercise any right under section 1, you may do so by way of a so-called data subject request, primarily in writing by conventional post or email, using the Controller's contact details above.

The Data Subject's right to judicial remedy - Initiating court proceedings

Where the Data Subject has experienced unlawful processing, they may bring civil proceedings against the Controller or Processor. Such proceedings fall within the jurisdiction of the regional court. At the Data Subject's choice, the proceedings may also be brought before the regional court of their place of residence (a list of the regional courts and their contact details is available at the following link: <http://birosag.hu/torvenyszekek>

Complaint to the supervisory authority - Without prejudice to any other administrative or judicial remedy, every Data Subject has the right to lodge a complaint with a supervisory authority - in particular in the Member State of their habitual residence, place of work or the place of the alleged infringement - if the Data Subject considers that the processing of personal data relating to them infringes the GDPR, in particular:

- if they consider that the Controller restricts the exercise of the Data Subject's rights specified in section 1 or rejects their request to exercise those rights (initiation of an investigation); and
- if they consider that, in processing their personal data, the Controller or a Processor appointed by or acting on the instructions of the Controller infringes requirements relating to the processing of personal data laid down by law or by a binding legal act of the European Union (request for administrative proceedings to be conducted).

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

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