

PRIVACY POLICY OF "THE LITTLE SURVIVOR" FOUNDATION

DATA CONTROLLER'S DATA

Name: "The Little Survivor " Foundation / "Kis Túlélő"
Alapítvány

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1. GENERAL PROVISIONS

- 1.1. The purpose of current Privacy Policy ("**Policy**") is to provide all data subjects involved in the data processing of the Little Survivor Foundation ("Foundation") with all important information regarding the processing of personal data by the Foundation and to provide prior information about the processing of his or her personal data, furthermore to comply with the applicable legal provisions on data protection and to ensure the consistency of the data management practices established by the Foundation with the applicable legislation. The data management of the Foundation is governed by the Directive of the European Parliament and of the Council (EU) 2016/679 ("**GDPR**") and Law CXII of 2011 on the right to self-determination as regards information and freedom of information ("**the Law on information**").

2. PRINCIPLES OF DATA MANAGEMENT

- 2.1. The Foundation manages the processing of personal data in a lawful, fair and transparent manner ("**legality, integrity, transparency**").
- 2.2. Personal data are collected for specified, explicit and legitimate purposes and will not be processed by the Foundation in a way incompatible with those purposes ("**purpose limitation**").
- 2.3. The Foundation shall ensure that personal data are appropriate and relevant to the purposes of the data processing and are limited to what is necessary ("**data minimisation**"), moreover that the personal data are accurate and, where necessary, kept up to date and that any personal data that is inaccurate concerning the purposes of data management shall be promptly deleted or rectified ("**accuracy**").
- 2.4. Personal data shall be stored in such form which permits identification of data subjects for no longer than is necessary for the purpose for which the personal data are processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes ("**limited storage**").
- 2.5. The Foundation shall process personal data in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, through the use of appropriate technical or organizational measures ("**integrity and confidentiality**").
- 2.6. The Foundation is responsible for compliance with data management principles and must be able to justify such compliance ("**accountability**"). The Foundation will also ensure that data subjects are provided with appropriate and detailed information about the processing of personal data prior to the initiation of the Foundation's data management.

3. PURPOSE, LEGAL BASIS, SCOPE OF DATA PROCESSING

- 3.1. The purpose of the Foundation is to support the rehabilitation of children with brain damage, to help and improve their special living conditions, and to protect their rights and interests.

- 3.2. The Foundation handles personal data provided by the data subject, or made available to the Foundation in any way, in accordance with the above-mentioned legislation on data protection regulations for the purpose of the Foundation. If the Foundation intends to treat personal data for purposes other than the purpose for which they were collected, it shall inform the data subject of the different purpose and any additional related information before further processing.
- 3.3. The Foundation is entitled to handle personal data in the event that it is entitled to. In particular, the Foundation is authorized to manage data especially by the existence of one of the following conditions:
- the data subject gave his or her consent to the processing of his or her personal data;
 - the processing is necessary for the performance of a contractual obligation;
 - the processing is necessary for compliance with a legal obligation of the Foundation;
 - the processing is necessary for the protection of the vital interests of the data subject or another natural person;
 - the processing is necessary for the performance of a task of public interest or public authority transferred to the controller.
- 3.4. In all cases where the right to data processing is the expressed written consent of the data subject, the data subject or an authorized person expressly consents to the processing of personal data by the data controller for the purpose and to the extent defined in the data protection rules.
- 3.5. The data subject shall have the right to withdraw his or her consent at any time. Withdrawal of the consent shall not affect the legality of the consent-based data management prior to the withdrawal. Withdrawal of the consent shall be made possible by the Foundation in the same way as it is granted.
- 3.6. The data management covers the data of the data subjects that are strictly necessary for the purpose of the Foundation, in particular the data of donors and children with brain injuries.

The controller handles the following personal data in relation to the above data subjects:

- family and first name,
- place and date of birth,
- mother's name,
- nationality,
- sex,
- permanent and temporary address,
- type and number of the identification document,
- name of parent / legal representative,
- permanent and temporary address of parent / legal representative,
- in case of a non-Hungarian citizen, residence status in Hungary,
- name and registration number of residence permit,
- company name,
- headquarter
- registration number,
- VAT number,
- telephone number,
- e-mail address,
- bank account number.

4. DURATION OF THE DATA MANAGEMENT OF THE FOUNDATION, METHOD OF DATA MANAGEMENT

- 4.1. The data controller is entitled to process the personal data of the data subjects until the data processing purpose is achieved. In exceptional cases, to fulfil the obligation specified by law, the data controller also handles the personal data of the data subjects after the fulfilment of the purpose.
- 4.2. Data management can be carried out either on paper or through electronic records. The personal data provided by the data subject to the data controller and stored on paper or electronic media examined by the data controller that is not necessary to achieve the purpose of the Foundation will be returned to the data subject without recording.

5. PEOPLE ENTITLED TO ACCESS DATA, TRANSMISSION OF DATA

- 5.1. The members of the Board of Trustees of the Foundation and the members of the Supervisory Board are entitled to get acquainted with the personal data of data subjects. In cases specified by legal regulations, the data controller is obliged to transfer the personal data of the data subjects and the documents and electronic media containing them to other recipients (authorities, judicial and other state bodies), who act in accordance with the applicable legislation during data processing.

6. RIGHTS OF DATA SUBJECT REGARDING DATA PROCESSING

- 6.1. The data subject whose personal data is managed by the Foundation has the following rights regarding the data management of the Foundation
- 6.2. The data subject may request information on the processing of his or her personal data, as well as request their rectification or, except for statutory data processing, their deletion (“right to forget”), blocking or restriction of data processing.
- 6.3. The data subject is obliged to notify the Foundation in writing of any change in his or her personal data managed by the Foundation, no later than within 5 working days from the occurrence of the change. The Foundation is obliged to correct inaccurate data.
- 6.4. At the request of the data subject, the data controller shall provide information on the data processed by him or her, their source, purpose, legal basis, duration, the data processor’s name, address and activity related to the data processing, circumstances of the data protection incident, remedial action, and in case of transfer of the personal data of the data subject, the legal basis and the recipient of the transfer.
- 6.5. The Foundation may refuse to inform the data subject only if it is limited by law, the external and internal security of the state, such as national defence, national security, crime prevention or law enforcement, as well as the state or local government due to financial interest and the protection of the data subject’s or others’ rights. The Foundation is obliged to inform the data subject about the possibility of the necessary legal remedy, as well as the possibility to apply to the Authority.
- 6.6. The data subject may object to the processing of his or her personal data,
 - a) where the processing or transfer of personal data is necessary solely for the performance of a legal obligation of the Foundation or in the legitimate interest of a third person, except in the case of compulsory processing;
 - b) if the use or transfer of personal data is for direct business acquisition, public opinion polling or scientific research; as well as
 - c) in other cases specified by law.
- 6.7. For the duration of the examination of the data subject’s objection, the data processing shall be suspended by the Foundation and the application shall be examined within a maximum of 15 days of its submission, a decision on its merits shall be made and the applicant shall be informed of the decision in writing.

- 6.8. If the Foundation establishes the validity of the data subject's protest, it shall terminate the data processing, including further data collection and data transfer, block the data, and notify all persons to whom it has previously transmitted personal data of the protest and the action taken on it. The addressees are obliged to take action to enforce the protest right.
- 6.9. Personal data must be deleted if
- a) its handling is illegal,
 - b) the data subject requests it,
 - c) the data is incomplete or incorrect - and this condition cannot be legally rectified - provided that cancellation is not precluded by law,
 - d) the purpose of the data processing has ceased or the term for the storage of the data specified by law has expired,
 - e) it has been ordered by a court or a data protection authority.
- 6.10. The Foundation is not allowed to delete the data of the data subject if the data processing has been ordered by law. However, the data may not be transferred to a third party if the Foundation has agreed to the protest or the court has established the legitimacy of the protest.
- 6.11. The data subject and all persons to whom the data have previously been transmitted for data processing purposes shall be notified of the rectification and deletion. The notification may be omitted if it does not harm the legitimate interests of the data subject in view of the purpose of the data processing.
- 6.12. Instead of deletion, the Foundation shall block the personal data if the data subject requests so or if, based on the information available to him or her, it can be assumed that the deletion would harm the data subject's legitimate interests. Personal data blocked in this way can only be processed for as long as the purpose of data processing, which excluded the deletion of personal data, exists.
- 6.13. In case the Foundation has disclosed personal data and is required to delete it, it shall take all reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the data controllers processing data that the data subject has requested the deletion of his or her personal data.
- 6.14. If the Foundation does not comply with the request for rectification, blocking or erasure, the Foundation shall, within 15 days of receipt of the request, communicate in writing or, with the consent of the data subject, electronically the reasons for rejecting the request for rectification, blocking or erasure. If a request for rectification, erasure or blocking is rejected, the data subject shall be informed of the possibility of legal remedy and appeal to the Authority.

7. LEGAL REMEDY

- 7.1. If the Foundation violates the data subject's rights in the course of data processing despite the provisions of the law ("**Data Management Incident**") or causes damage in connection therewith, the data subject may choose to apply to the data protection authority and court.

Data protection supervisory authority:
National Authority for Data Protection and Freedom of Information
1125 Budapest, Szilágyi Erzsébet fasor 22 / C

8. FINAL PROVISIONS

- 8.1. The current privacy policy is valid from 9th September 2019.
- 8.2. The current privacy policy is available on the website of <http://www.kistulelo.hu/>

