

DATA HANDLING POLICY

INTRODUCTION

The purpose of this Policy is that the Foundation as data controller appropriately informs the data subjects about the significant conditions for data handling and the rights of the relevant parties, and that it complies with its obligations set forth in Articles 13 and 14 of the Regulation¹ concerning the availability of information.

This Policy is continuously available on the Foundation's website (www.pallasalapitvanyok.hu) and shall be sent to the relevant parties directly by the Foundation upon request.

SECTION I NAME OF DATA CONTROLLER

Publisher of this Policy and Data Controller:

Name: Pallas Athene Innovation and Geopolitical Foundation

Seat: 1013 Budapest, Döbrentei utca 2.

Registration number: 01-01-0012554

Representative during the data handling activity: Zsolt Szorenyi

E-mail address: root@paigeobudapest.hu

Website: www.pallasalapitvanyok.hu / www.geopolitika.hu

(hereinafter as: the Foundation)

SECTION II NAME OF DATA PROCESSORS

In terms of this Policy, the data processor shall be the legal entity that handles personal data for the Foundation as Data Controller.

The Foundation may entrust the data processor without the prior consent of the relevant party but shall inform such party. Accordingly, the following information shall be provided about the data processors that deal with the data handled by the Foundation:

The accounting service provider of the Foundation

To fulfil its public contribution and accountancy obligations, (which is the purpose of data handling, too), the Foundation entrusts an external accountant and its subcontractor, a payroll company, who handle the personal data of natural persons having employment or other contractual relations (typically a grant contract, scholarship or agency contract) with the Foundation.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council - (27 April, 2016) 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)

These data processors are the following:

Accounting service provider

Company name: Optima Befektetési Zrt.

Seat: 1013 Budapest, Döbrentei utca 2.

Company registration number: 01-10-048464

VAT number: 25294848-2-41

Representative: dr Zoltán Fekete CEO

e-mail address: info@optimabudapest.hu

Payroll company:

Company name: RUHAN Számviteli and Munkaügyi Kft.

Seat: 2092 Budakeszi, Knáb János utca 38.

Company registration number: 13-09-134511

VAT number: 11735036-2-13

Representative: Anikó Varga Managing Director

e-mail address: anikoridacs@t-online.hu

To conclude the grant and scholarship contracts, coordinate completion, check accounting and close completion, the Foundation entrusts an external agent, who is responsible for handling the personal data of natural persons having an employment relationship with the Foundation as a private person, on, in case of a contract entered into with an organization, as a contact person, which is responsible for handling the personal data of natural persons having grant or scholarship contractual relations.

The service provider:

Company name: Optima Befektetési Zrt.

Seat: 1013 Budapest, Döbrentei utca 2.

Company registration number: 01-10-048464

VAT number: 25294848-2-41

Representative: dr Zoltán Fekete CEO

e-mail address: info@optimabudapest.hu

SECTION III

EMPLOYMENT-RELATED DATA HANDLING

Employment and personnel register

1.) Only data that are necessary for the establishment, maintenance and termination of the employment relationship and do not violate the employee's rights attached to the person may be requested from the employee and filed.

Purpose of handling personal data: establishment and maintenance of employment relationship, fulfilment of rights and liabilities related to the employment relationship.

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2.) The Foundation shall handle the following data of the employees by virtue of exercising its lawful employer's rights:

1. name
2. birth name,
3. date of birth,
4. mother's name,
5. address,
6. citizenship,
7. tax identification number,
8. social security number,
9. pensioner identification number (for retired employees),
10. phone number,
11. e-mail address,
12. identification card number,
13. number of official certificate attesting place of residence,
14. banking account number,
15. date of entry to employment,
16. job title,
17. photocopy of education and qualifications,
18. photo,
19. CV,
20. data related to the amount of salary and other allowances,
21. mode and date of termination of employment relationship,
22. summary/results of aptitude tests (compulsory occupational medical examination),
23. in case of private pension fund or voluntary mutual fund membership, the name, identification number and employee membership number of the fund,
24. for foreign employees, passport number; name and number of document certifying work permit,
25. data generated related to accidents at work and required for employer's administration,
26. SZÉP Card, health insurance scheme and other data disclosed for the Cafeteria allowances.

The data concerning an employee's debt to be deducted from his or her salary based upon a final and absolute decision or legal provision shall be handled by the Foundation in accordance with Section 24 of Act no. LIII/1994 on Judicial Execution.

The scope of personal data that can be handled in relation to Point 22 includes the fact of fitness for work and any conditions required for this.

Any data on incapacity for work and required for sick payment or other type of monetary health insurance benefit shall be handled within the scope of data handling owing to the fulfilment of legal obligation.

The personal data specified in this Article shall be forwarded to the current organization having contractual relations with the Foundation regarding the fulfilment of accountancy and payroll tasks, i.e. OPTIMA Befektetési Zrt., who is at the same time the recipient of

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personal data, too. At the recipient, the employees and data processors fulfilling taxation, book-keeping, payroll and social security duties are entitled to receive personal data according to this Article 2.).

The recipient of the employees' personal data within the organization shall be the person exercising employer's rights.

Duration for storing personal data: the statutory period for the given data, and, unless otherwise specified by law, 3 years upon termination of the employment relationship.

Handling the data (CVs) of applicants

The Foundation shall handle the content of the CVs submitted by the applicants of the jobs and any other personal data supplied during the application procedure.

Scope of personal data that may be requested from applicants are: name, date and place of birth, mother's name, address, qualifications, previous jobs and other relevant experience, photo, phone number, e-mail address of the natural person.

Purpose of handling personal data: evaluation of application, conclusion of employment contract with the candidate.

Legal basis for data handling: the legitimate interest of the Foundation.

Recipients of personal data: persons entitled to exercise employer's rights at the Foundation.

Duration for storing personal data: Until the employment contract is completed with the selected candidate.

**SECTION IV
CONTRACT-RELATED DATA HANDLING**

Handling the data of contracting partners – registration of customers and suppliers

Natural persons and individual entrepreneurs as contractual partners

By virtue of completion of contract, the Foundation shall handle the name, birth name, mother's name, address, tax identification number, VAT number, individual entrepreneur's number, personal identity card number, address, seat, premises address, phone number, e-mail address, bank account number and social security number of the natural person entering into a contract with them as a supplier, grantee, scholarship holder, etc. for the conclusion, completion and termination of the contract.

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Recipient of personal information: The employee of the Foundation appointed to contribute in the completion of the contract. For the completion of the taxation, accountancy and book-keeping contractual and statutory requirements, all personal information required for the completion of the contract shall be forwarded to the current organization having contractual relations with the Foundation for the fulfilment of accountancy and payroll duties, which organization at present is OPTIMA Befektetési Zrt. as data processor. The taxation, book-keeping, payroll and social security employees and data processors shall have the right to receive the data of the data subject.

Beyond the above, the personal data according to this Article shall be forwarded to the organization having contractual relations with the Foundation for the completion of grant and scholarship contracts, management of completion, checking of settlement and closing of contracts, i.e. OPTIMA Befektetési Zrt. as data processor, where the persons authorized to receive the data are employees working as application referee and application coordinator for the data processor.

Duration for storing personal data: 5 years upon termination of contract.

Legal basis for the handling of personal information: completion of contract.

The relevant natural person shall be informed during the contract conclusion that the legal basis for data handling shall be the completion of the contract. The data subject shall be notified of the forwarding of his or her personal data to the data processor.

Contracts concluded with organizations

The Foundation shall handle the personal data of the contact person and representative having contractual relations with the Foundation of the customer or supplier as well as their personal data disclosed to it during the completion of the contract in connection with it.

Scope of personal data that can be handled: name, phone number and e-mail address of the natural person.

Purpose of handling personal data: completion of the contracts of the Foundation.

Legal basis for handling the personal data: completion of contract / in case of the relevant natural person, the consent of the data subject.

Recipient of personal data: employee of the Foundation appointed to contribute in the conclusion and completion of the contract. For the completion of the contract the personal data of the contact person according to this Article shall be forwarded to the organization having contractual relations with the Foundation concerning the conclusion and completion management of the contract and the checking of accounting, i.e. OPTIMA Befektetési Zrt. as data processor, where the persons authorized to have access to the data at the data processor include the employees working as application referee and application coordinator.

Duration for storing personal data: 5 years upon the business relationship.

The employee of the Foundation appointed for the conclusion and completion of contract shall inform the data subject in a verifiable fashion about the conditions of data handling as specified in the present Article.

7. Data handling related to the newsletter service

(1) On the website the natural person subscribing to the newsletter service may give their consent to the handling of their personal data by ticking the appropriate box. It is forbidden to mark the box preliminarily. The data subject may unsubscribe from the newsletter any time using the “Unsubscribe” application of the newsletter, making a declaration in writing or via e-mail, which shall mean withdrawal of consent. In such cases the data of the person unsubscribing the newsletter shall be deleted without delay.

(2) Scope of natural data that can be handled: name (surname, given name) and e-mail address of the natural person.

(3) Purpose of handling personal data:

1. Sending newsletters on the research activity and events of the Foundation
2. Sending advertising material.

(4) Legal basis for the handling of personal information: consent of the data subject.

(5) Recipients of personal data and categories of recipients: employees of the Foundation fulfilling newsletter-related tasks as data processors employees of the Foundation’s IT service provider for the completion of web hosting service,

(6) Duration for storing personal data: until the newsletter service exists, or until the data subject withdraws their consent (until their cancellation request).

8. Community guidelines / Data management on the Facebook page of the Foundation

To provide better information about and promote its activity and events, the Foundation runs a Facebook page. On its Facebook page, the Foundation does not handle the personal data disclosed by the visitors but the Data Use Policy of Facebook shall be applicable. The Foundation is not liable for the unlawful data contents or comments posted by Facebook visitors.

SECTION V DATA HANDLING BASED ON LEGAL OBLIGATIONS

1.) Data handling based on the completion of statutory obligations does not depend on the consent of the data subject because data handling has been specified by legal provisions. In such cases, the data subject shall be informed before the data handling commences that data handling is compulsory, and the data subject shall clearly and thoroughly be notified before the data handling commences about all facts related to the handling of their data, including but not limited to the purpose of and legal basis for data handling, the person entitle to handle and process data, the duration of data handling, the fact whether the personal data of the data subject are handled by the data controller based upon a relevant

legal requirement, and the persons who have the right to receive such data. Information shall be provided about the rights and remedial opportunities of the data subject in relation to the data handling. In case of compulsory data handling, information may be provided by publishing the reference to statutory provisions including the above information.

2.) By virtue of fulfilment of legal obligation and for the purpose of completing the statutory taxation and accountancy obligations (accounting, taxing), the Foundation shall handle such data of natural persons having relations with it as customers, suppliers, grantees, scholarship holders or employees that are necessary for fulfilling the statutory equal tax burden and receiving cash benefits for social security purposes. The scope of data handled is specified by Section 167 of Act No. C/2000 on Accountancy, Sections 169 and 202 of Act No. CXXVII/2017 on the General Turnover Tax, Act No. CXVII/1995 on the Personal income Tax, as well as the legal provisions stipulating certain social security payment obligations and allowances.

The duration for storing the personal data shall be 8 years upon termination of the legal relations forming the legal basis.

Personal data according to this Article 2.) shall be forwarded the current organization having contractual relations with the Foundation concerning the fulfilment of accountancy and book-keeping tasks, i.e. OPTIMA Befektetési Zrt., who is also recipient of the personal data. At the recipient, the employees and data processors fulfilling taxation, book-keeping, payroll and social security duties are entitled to receive personal data according to this Article 2.).

SECTION VI SUMMARY INFORMATION ABOUT THE DATA SUBJECT’S RIGHTS

The subject data’s right to proper information

The Foundation shall make its ***general data handling policy*** according to Annex No. 2. available on its website (www.pallasalapitvanyok.hu) and send it to the data subject individually upon request. This Policy aims to provide the subject data with clear and detailed information in a publicly available form prior to the data handling about everything on the data handling, including the purpose of and the legal basis for data handling, the person authorized to data handling and data processing, the duration for the data handling, the legal ground on which the Foundation handles the personal data of the data subject and the persons the data can be disclosed to. The information shall also cover the rights and remedial possibilities of the data subject in relation to the data handling.

The right to advance information

The data subject has the right to receive information about the fact and information related to data handling prior to the beginning of data handling.

1. If the personal data concerning the data subject *is collected from the data subject*, the Foundation shall provide the data subject with each of the following information upon receiving the personal data:

- a) the identity and contact information of the representative of the Foundation as data controller and the data controller;
- c) the purpose and legal ground of handling personal data;
- d) in case of data handling based on legitimate interests, the legitimate interests of the data controller or third party;
- e) the recipients of the personal data and the categories of recipients, if any;
- f) the duration for storing the personal data, or if that is not possible, the aspects of specifying such duration;
- g) listing the rights of the data subject; the fact that he or she may request the data controller to make his or her personal data available, correct, delete them or restrict their handling, and he or she may protest against the handling of such personal data, and that he or she has the right to data portability; as for data handling based on the consent of the subject data, the right of withdrawing the consent at any time, which shall not affect the legitimacy of any data handling carried out on the basis of the consent prior to the withdrawal; the right to lodge a complaint with a supervisory authority;
- h) whether the provision of personal data is subject to a legal provision or a contractual obligation, or it is a precondition for the conclusion of a contract, and whether the data subject is obliged to supply his or her personal data, and what consequences the absence of data supply might have;
- i) the Foundation applies no automatized decision-making during the data handling.

If the Foundation intends to perform further data handling of the personal data for any purpose other than that of the collection, it shall inform the data subjects about this different purpose and any relevant additional information prior to further data handling.

Access right of the data subject

The data subject has the right to receive feedback from the Foundation whether his or her personal data are being handled, and if yes, he or she is entitled to have access to such personal data and any information related to the data handling.

Right of rectification

The data subject has the right to request the data controller to correct any of his or her wrong personal data in reasonable time. Taking the purpose of the data handling into consideration, the data subject may ask for supplementation of any deficient personal data.

The right of deletion (“the right to be forgotten”)

The data subject has the right that at their request the Foundation deletes their personal data within a reasonable time, provided that

- a) the personal data are not required any longer for the purpose they have been collected or handled in any other way;

- b) the data subject withdraws their consent constituting the basis for the data handling, and the data handling has no other legal ground;
- c) the data subject protests against their data handling and there is no priory lawful reason for the data handling;
- d) the personal data have been handled contrary to the law;
- e) the personal data shall be deleted for the fulfilment of any legal obligation applicable to the Foundation or specified in the law of the European Union or the Member State;
- f) the personal data have been collected in connection with the provision of services related to the information society.

The right to restrict data handling

The data subject has the right to request the data controller to restrict the data handling if

- a) the data subject doubts the accuracy of the personal data; in this case the restriction includes the duration allowing the Foundation to check the accuracy of the personal data;
- b) the data handling is contrary to the law, and the data subject protests against the deletion of the data but applies for restriction of their use;
- c) the Foundation no longer needs the personal data for the purpose of the data handling; however, the data subject needs them for the submission, enforcement or defense of his or her legal claims; or
- d) the data subject has protested against the data handling; in this case the restriction shall refer to the period until it has been established that the legitimate reasons of the Foundation have a priority over the legitimate interests of the data subject.

The data controller shall inform such recipient about any correction, deletion or restriction of data handling who has been notified the personal data, except for the case it seems to be impossible or requires disproportionately many efforts. At request, the Foundation informs the data subject about such recipients.

The right to protest

The data subject has the right to protest at any time for any reason related to his or her status against the handling of his or her personal data required for the performance of duties for public interests or for exercising public powers, or based on the enforcement of the legitimate interests of the data controller or a third party. In this case the Foundation may not handle the personal data any longer, unless it proves that data handling is necessary for coercive legitimate reasons that have a priority over the interests, rights and freedoms of the data subject, or that are related to the submission, enforcement or defense of legal claims.

If the personal data are handled for scientific and historical research purposes or a statistical purpose, the data subject has the right to protest for reasons related to his or her situation against the handling of his or her personal data, unless such data handling is required for the performance of tasks for public interests.

Restrictions

The law of the European Union or the Member State applicable to the Foundation or the data processor having contractual relations with it may restrict the effect of certain rights and obligations specified in the Regulation with legislative initiatives for reasons specified therein.

Informing the data subject about the data protection incident

If the data protection incident is expected to entail a high risk with respect to the right of and freedoms of the natural persons, the Foundation shall notify the data subject of the data protection incident within reasonable time.

The information shall clearly and intelligibly present the nature of the data protection incident, its possible consequences and the measures taken or to be taken to remedy such data protection incident, including any measures aiming to mitigate any potential harmful consequences arising from the data protection incident.

It is not necessary to inform the data subject if:

- a) the Foundation has taken appropriate technical and organizational protection measures, and these measures have been adopted with respect to the data affected by the data protection incident, especially measures –like the adoption of encryption – that make the data uninterpretable for persons not authorized to use the receive the personal data;
- b) upon the data protection incident, the Foundation has taken measures that ensure that the high risk attached to the rights and freedoms of the data subject is unlikely to occur;
- c) supplying information would require disproportionate efforts - in such cases the data subjects shall be informed with published information or similar measures ensuring efficient information supply to the data subjects shall be taken.

The right to lodge a complaint with the supervisory authority (right to official remedies)

Every data subject shall have the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the rules of the Regulation.

The data subject has the right to effective judicial remedies against the statutory decision of the supervisory authority imposed on them, or if the supervisory authority fails to deal with the complaint or inform the concerned person within three months about the developments or the result of the procedure launched upon the complaint.

Data of the supervisory authority:

Nemzeti Adatvédelmi and Információszabadság Hatóság
(Hungarian National Authority for Data Protection and Freedom of Information)
<http://naih.hu>
Postal address: 1530 Budapest, Pf.: 5.
E-mail: ugyfelszolgalat@naih.hu
Phone: +36 (1) 391-1400

The right to effective judicial remedies against the data controller or the data processor

Each data subject has the right to effective judicial remedies if, at their discretion, their rights have been violated as a result of handling their personal data against the Regulation.

A) Information to be provide if the personal data are connected from the data subject

1. If the personal data of the data subject is collected from the data subject, the Foundation
2. Upon receiving the personal data, the Foundation shall supply the following information to the data subject:
 - a) the identity and contact information of the data controller and the representative of the data controller according to Section I;
 - b) no data protection clerk shall be appointed at the Foundation in accordance with Paragraph (1), Article 37 of the Regulation;
 - c) the purpose of the planned personal data handling and the legal basis for data handling based upon legitimate interests according to the stipulations of this Policy, indicating the legitimate interest;
 - e) recipients of the personal data collected, and categories of recipients, if any;
 - f) the fact that the data controller does not intend to forward the personal data to a third country or an international organization;
 - g) the duration for storing the personal data, or the aspects of specifying the duration;
 - h) the data subject has the right to apply the data controller for access to his or her personal data, for their correction, deletion or restriction of handling, and me or she may protest against the handling of such personal data; nevertheless, the data subject has no access to data portability as the Foundation performs no automatized data handling;
 - i) in case of data handling subject to the data subject's consent, such consent may be withdrawn any time, which shall not affect the lawfulness of the data handling performed prior to the withdrawal, based upon the consent;
 - k) the data subject has the right to lodge a complaint with a supervisory authority;
 - l) whether the provision of personal data is subject to a legal provision or is a precondition for contract conclusion, and whether the data subject is obliged to supply the personal data, and what possible consequences the lack of data supply can have;
 - m) the Foundation performs no automatized data handling;
 - n) the Foundation intends to perform no further data handling for any purpose other than that of collecting them;

B) Information to be made available if the personal data were not obtained from the data subject

1. If no personal data have been obtained from the data subject, the data controller shall provide the following information to the data subject:
 - a) identity and contact information of the data controller and the representative of the data controller according to Section I of this Policy;

- b) no data protection officer shall be appointed at the Foundation in accordance with Paragraph (1), Article 37 of the Regulation;
- c) the purpose of the planned personal data handling and the legal basis for data handling based upon legitimate interests according to the stipulations of this Policy, indicating the legitimate interest;
- d) categories of the given personal data;
- e) recipients of the personal data, and categories of recipients, if any;
- f) the fact that the data controller does not intend to forward the personal data to a third country or an international organization;
- g) the duration for storing the personal data, or the aspects of specifying the duration;
- h) the data subject has the right to apply the data controller for access to his or her personal data, for their correction, deletion or restriction of handling, and he or she may also protest against the handling of such personal data; nevertheless, the data subject has no access to data portability as the Foundation performs no automatized data handling;
- i) in the case of data handling based upon the consent of the data subject, the data subject may withdraw such consent any time, which, however shall not affect the lawfulness of data handling carried out prior to withdrawal based upon the consent;
- j) the data subject has the right to lodge a complaint with a supervisory authority;
- k) the source of the personal data and in certain cases whether the data come from a public source;
- l) the fact that the Foundation performs no automatized data handling;

3. The Foundation shall provide information as follows:

- a) considering the actual circumstances of the handling of personal data, within reasonable time upon receiving the personal data but not later than within a month;
- b) if the personal data are used for the purpose of keeping contact with the data subject, at least upon the first contact with the data subject; or
- c) if the data are planned to be supplied to other recipients, too, not later than upon supply of such personal data for the first time.

4. If the Foundation intends to perform further data handling of the personal data for any purpose other than the purpose of receiving them, it shall inform the data subjects about this different purpose and any relevant additional information prior to further data handling.

5. It is not necessary to make the above information available if and insofar:

- a) the data subject is already aware of the information;
- b) the information may not be made available or it would require disproportionately many efforts; however, in such cases the data controller shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject;
- c) the obtaining or supplying of the data is expressly stipulated in the law of the European Union or the Member State that provides for the appropriate measures to be taken for the protection of the data subject's legitimate interests and that is applicable to the data controller; or
- d) the personal data shall be kept confidential based upon any obligation of professional secrecy set forth in any EU or Member State law, including the statutory obligation of secrecy.

**SECTION VIII
SUBMITTING THE DATA SUBJECT’S REQUEST,
THE DATA CONTROLLER’S ACTIONS**

Actions at the request of the data subject

As the data controller, the Foundation shall inform the data subject within reasonable time but not later than 8 days upon receipt of request about the actions taken upon their request to exercise their rights.

If the data subject submits their request electronically, the information shall be provided electronically if possible, unless the data subject requests otherwise.

If the Foundation has reasonable doubts about the identity of the natural person submitting the request, it may ask the data subject to supply further information to confirm their personal identity.

Pallas Athene Innovation and Geopolitical Foundation