

Data policy

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This Prospectus is governed by Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, hereinafter "GDPR") and Regulation CXII of 2011 on the right to information self-determination and freedom of information. In accordance with the provisions of the Act (hereinafter: "Information Act"), it ensures the enforcement of the principle of lawful, fair and transparent data management and your right to information self-determination.

The Geopolitical Council Public Benefit Foundation (hereinafter: the Foundation) - as the owner and operator of the www.cgeopol.hu and www.geotan.hu websites (hereinafter: the Website) - informs the visitors of the Website with the present Data Protection Information (hereinafter: Users) of the terms and conditions of data management during the Website and the services available on the Website, including the manner, purpose, legal basis, duration, scope of data processed, possible data transfers, person authorized to handle or process data, and personal data the data subject's data processing rights and remedies. Contact information of the foundation: Headquarters: 1036 Budapest, Kiskorona u. 14. VI / 31. Email: research@cgeopol.hu
Phone: 06-1-315-23-20

I.

About data management

1. Who is the data controller and who is covered by the data management?

This data management information covers the individual members of the Foundation, the private contacts of our contractual partners, senior officials (collectively: contact persons), as well as the users of the Foundation's websites and persons applying for the Foundation's research, events and lectures. Contact information is called "personal information". The Foundation acts as the responsible data controller of your personal data. The scope of this Prospectus extends to persons who register on the Foundation's website (www.cgeopol.hu and www.geotan.hu) or who come into contact with the Foundation in any other way.

2. Why do we handle your personal information?

We process your personal data for the following purposes:

- (a) fulfilling requests and inquiries submitted through the Foundation's websites, electronic contacts and personal e-mail addresses;
- (b) the exercise of rights and obligations arising from the contractual obligations of the Foundation,
- (c) liaising with you to promote and monitor existing or future researcher / lecturer relationships to accompany;
- (d) sending an information letter;
- (e) application or registration for events;
- (f) participation in professional and legal consultations.

If you are a researcher or lecturer, we will only handle information about you that is necessary to enable you to exercise your contractual rights and obligations, and to contact you to promote and monitor the effectiveness of your collaboration. Typically, we handle your information such as your name, position and contact information, like email addresses and telephone numbers, and we will not record or otherwise retain information about you that could be considered “sensitive data”. We will only use information about you and for purposes that are considered normal to our relationship with you, such as regular contact with federal programs and events, federal news, including information and invitations to certain events, or general information about the Foundation. Based on your consent, we also manage your professional resume (CV).

If you are not yet a contractual partner, and we have contacted you in writing or in person or as a visitor to the website, the purpose of data management is to keep in touch with you, to inform you regularly, by e-mail newsletter, telephone or by mail – according to your choice.

3. What personal data does the Foundation handle?

Personal information may come directly from you or from public sources (such as the business register). Such personal data can be divided into the following broad categories:

- **Personally identifiable information**, including name; home address, Facebook and LinkedIn username
- **Contact information** such as address, e-mail address and telephone number; selected communication channels;
- **Activity data**, title and position
- **Presentation data**, such as the date of application, recommended topics, location, possible special data on performances;
- **Bank details**, such as bank account number, tax number, payment / billing information;
- **Opinion data**: your position on research or legislative consultation matters,
- **Communication data**, including e-mail content, letters, contract content and other business documents
- **IT data**: website visitors' computer IP address, operating system, browser type and the title of the page visited, the duration of the visit.

When we ask you to provide personal information, we mark certain information as mandatory or necessary (*), as this information is necessary in order for us to provide the service to you. If you choose not to provide us with this information, we may not be able to contact you.

4. On what legal basis do we process personal data?

We rely on different legal bases to process your personal data:

- **Agreement**: If you are a visitor to our website or website, the processing of your personal data is subject to Section 13 / A of the Electronic Commerce Act. § and Article 6 (1) (b) of the GDPR. If you are our researcher or rapporteur, the legal basis for the processing of your personal data is usually Article 6 (1) (b) of the GDPR (so the processing of data required to

fulfill your contract (membership relationship) at your request). Our data management is also based on a contract if you register for our event.

- **Legitimate interest:** Data processing is also based on the legitimate interest of the Foundation to facilitate ongoing contact between you and the Foundation in order to promote and monitor the relationship between you (your employer) and the Foundation (Article 6 of the GDPR (Paragraph 1 (f)). Certain data processing related to the security of our website is based on a legitimate interest. The legitimate interests of the Foundation are set out in the following section.

- **Consent:** In some cases, such as sending newsletters and information, we ask for consent to data processing (pursuant to Article 6 (1) (a) of the GDPR);

- **Legal obligation:** the processing of your data may be mandatory for tax, accounting or administrative or judicial purposes (pursuant to Article 6 (1) (c) and (e) of the GDPR). The Foundation will only make your personal data available to third parties without your consent in the event of a legal obligation.

5. The Foundation has a legitimate interest in the processing of personal data

Legitimate interests	Legitimate interest test
Fulfillment of rights and obligations related to the contractual relationship	The Foundation has a legitimate interest in fulfilling its obligations arising from the membership relationship and in handling personal data in order to enforce its rights.
Analysis of user habits, preparation of traffic statistics on www.cgeopol.hu and www.geotan.hu	During the visit and / or registration of the www.cgeopol.hu and www.geotan.hu websites, the Foundation (or its technical server) records the IP address of the users, from which in some cases the person concerned can be inferred, in addition, the operating system, the browser type and address of the page you are visiting. Data backup is primarily for technical purposes and is essential for the continuous operation of the system. Another purpose of data recording is to analyze user habits and compile traffic statistics, which helps to provide an even higher standard of service.

If you request more detailed information about this legitimate interest of the Foundation and the result of the interest balance, please contact us at the e-mail address research@cgeopol.hu.

6. Who has access to your personal information?

Your data will be accessed within the Foundation by the Chairman of the Board of Trustees and the Foundation's case management staff.

We may transfer the personal data of persons outside the Foundation to third parties for the following reasons:

- For certain third parties: we may transfer personal data about you to the Foundation's external consultants (eg lawyers, auditors), financial institutions, in particular for the administration and payment of invoices, for communication with you and third parties, and for official

to respond to and comply with inquiries and legal claims;

- Providers: uses services provided by third parties to support the Foundation's internal procedures. For the purpose of the given system or service and on the basis of an appropriate data processing contract concluded between the Foundation and the service provider, personal data may be available to such service providers. The operation and maintenance of the website under the www.cgeopol.hu domain, as well as the electronic storage (hosting) of personal data by Magyar Telekom Plc. 1519 Budapest, Pf. 434, while the operation of the website under the www.geotan.hu domain, maintenance and electronic storage (hosting) of personal data as a data processor of Samuel FB Morse Kft. (H-1029 Budapest, Bocskai út 2. Tax number: 12830732-2-41).

II.

Rights related to data management

1. Right to information / access

The User may request information from the Foundation in writing or by e-mail via the contact details provided above as to whether the personal data is being processed by the Foundation. If such data processing is in progress, the User is entitled to request information from the Foundation, what personal data, on what legal basis, for what purpose, from what source and for how long is processed, and to whom, when, under what legislation or to whom the personal data is transmitted, including in particular third country recipients or international organizations.

The Foundation will respond to the User's request for information within a maximum of 30 days, by letter or e-mail sent to the contact details provided by the User.

The User is entitled to have access to his / her personal data by the Foundation sending the relevant personal data to the User in writing or by e-mail.

2. Right to rectification

The User may, through the contact details of the Foundation specified above, in writing or by e-mail, request that the Foundation modify any of his personal data without delay, or request the completion of incomplete personal data. For example, you can change your email address or password at any time.

The Foundation will respond to the User's request for information within a maximum of 30 days, by letter or e-mail sent to the contact details provided by the User.

3. Right of cancellation / forgetting

The User may request, through the Foundation's contact details provided above, in writing or by e-mail, that the Foundation delete his personal data without delay if any of the following reasons exist:

(a) personal data are no longer required for the purpose for which they were processed by the Foundation;

- b) the User withdraws the consent on which the data processing is based, and the data processing has no other legal basis;
- c) the User objects to the data processing and there is no other legal reason for the data processing,
- d) your personal data has been unlawfully processed by the Foundation;
- (e) personal data must be deleted in order to comply with a legal obligation applicable to the Foundation;
- (f) personal data have been collected in connection with the provision of information society services to children.

The Foundation will fulfill the User's request within a maximum of 30 days and will notify the User thereof by sending a letter to the contact details provided by the User.

4. Right to block / restrict data processing

The User may request, through the Foundation's contact details provided above, in writing or by e-mail, that the Foundation block his personal data or restrict data processing if any of the following reasons exist:

- a) the User disputes the accuracy of the personal data, in which case the blocking / restriction applies to the period of time that allows the Foundation to check the accuracy of the personal data;
- b) the data processing is illegal and the User objects to the deletion of the data and instead requests a restriction on their use;
- c) the Foundation no longer needs personal data for the purpose of data processing, but the User requests it in order to submit, enforce or protect legal claims;
- d) the User has objected to the data processing; in that case, the restriction shall apply for as long as it is established whether the legitimate reasons of the Foundation take precedence over the legitimate reasons of the person concerned. In the event of blocking / restriction of data, such personal data may be processed, with the exception of storage, only with the consent of the User, or for the submission, enforcement or protection of legal claims, or for the protection of the rights of other natural or legal persons or in the important public interest. The blocking / restriction lasts as long as the reason indicated by the User necessitates the storage of the data.

5. The right to data portability

The User may request at the Foundation's contact details provided above, in writing or by e-mail, the personal data provided by the User to the Foundation in a structured, widely used machine-readable format, and is entitled to share this data with another Transfer it to the Foundation without being hindered by the Foundation to which you have provided the personal data if the data processing is based on the User's consent or contract and the data processing is carried out in an automated manner. The Foundation will fulfill the User's request within a maximum of 30 days and will notify the User thereof by sending a letter to the contact details provided by the User.

6. Right to protest

The User may at any time, through the contact details of the Foundation provided above, in writing or by e-mail, object to the processing of his personal data based on the legitimate interests of the Foundation or a third party. In this case, the Foundation may not further process its personal data, unless the Foundation proves that the processing is justified by

overriding legitimate reasons which take precedence over the interests, rights and freedoms of the User or which are necessary to bring, enforce or defend legal claims.

The User may at any time, through the contact details of the Foundation provided above, in writing or by e-mail, object to the processing of his personal data for the purpose of direct business acquisition, in which case his data must no longer be processed for this purpose.

The User may also express this protest by clicking on the "I unsubscribe from the newsletter" button in the newsletters / advertising letters sent by the Foundation via e-mail, as a result of which the Foundation will no longer send a newsletter / advertising letter to the User.

7. Automated decision making in individual cases, including profiling

The Foundation does not use decision-making based solely on automated data management, including profiling. Should the Foundation introduce a decision-making procedure based on such data management in the future, it will inform the User in advance by e-mail about the applied logic, method and its essence, and give the User the opportunity to request human intervention, express his / her position, or file an objection to the decision.

III.

Data management enforcement options

If you experience illegal data processing, it is advisable for the User to send the complaint to the Foundation first before initiating the legal proceedings, as this will allow the Foundation to restore the legal status by itself. By submitting a notification (complaint) to the supervisory authority, the User may initiate an investigation on the grounds that his or her personal data has been violated or it is in imminent danger. The name and contact details of the supervisory authority are as follows: National Data Protection and Freedom of Information Authority

Headquarters: 1125 Budapest, Szilágyi Erzsébet avenue 22 / c. Postal address: 1530 Budapest, Pf.: 5

E-mail: ugyfelszolgalat@naih.hu

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Website: www.naih.hu

In case of illegal data processing experienced by the User, he may initiate a civil lawsuit in court. The trial falls within the jurisdiction of the tribunal. The lawsuit may, at the option of the User, be instituted in the court of the place of residence. You can view the list and contact details of the courts through the following link: <http://birosag.hu/torvenyszekek>.

IV.

Cookie policy

Cookies are small text files that contain a unique identifier that is stored on your computer or mobile device so that the device used by the User will be recognizable when you visit a particular website or use an application. Cookies may only be used for the duration of a visit to a particular page or to measure how the User uses the service and content from time to time. Cookies help us display important features and functions used on the Website and in mobile applications.

During the User's visit to the Website, data can be automatically collected about his visit, domain names of the website from which the User was redirected to the Website, search engine, operating system type, IP address, User ID and other information provided by the https protocol forwarded to the Google Analytics account.

Google's privacy policy governs the stored data. Google guidelines can be found on google.hu. The cookies used on the Website are not harmful to the User or the computer / terminal used by him / her, therefore we recommend that you do not disable their service in the browsers. The User may change the way cookies are used via the browser, including blocking or deleting those from the Website (and other Internet portals). To do this, you need to change your browser settings. The deletion method differs depending on the browser used. Information on how to remove cookies can be found on the "Help" tab of the selected browser. More information about cookies can be found on the following main browser pages:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

Detailed information on how to manage cookies on your mobile phone or other mobile device can be found in the User Manual / User Guide for that phone or mobile device. Restricting the use of cookies on a particular device makes it impossible or makes it very difficult to use the Website properly, for example, it may be impossible to maintain the login period. The legal basis for the data processing is the User's consent, according to which the User agrees in advance to the processing of the personal data listed above by the Foundation under the terms of this Policy, pursuant to Article 6 (1) (a) GDPR. You have the right to withdraw your consent at any time, without prejudice to the lawfulness of the data processing carried out on the basis of the consent before the withdrawal.

V.

Review and amendment of the Policy

Circumstances of data management may change from time to time, and the Foundation may at any time decide to add a new data management purpose to its ongoing data management, therefore the Foundation reserves the right to amend this Policy at any time. The Foundation will notify the User of any changes to this Policy via the official website.

VI.

Data management legislation

The following legislation applies to the processing of the User's personal data: REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Regulation 95/46/EK (General Data Protection Regulation) ("GDPR"), the current text of which can be found at [http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679 & rid = 1](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&rid=1) Act CXII of 2011 ("Infotv."), on the right to information self-determination and freedom of information; the effective text of which is available at the following link:

http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A1100112.TV

VII.

Other information

We will be happy to provide further information or respond to your request to exercise the above rights. In case of such a request, you can send an e-mail with the subject "PRIVACY REQUEST" to the following address: research@cgeopol.hu