

Three Princes, Three Princesses Foundation

Data Protection and Data Management Policy

Based on *General Data Protection Regulation 2016/679* of the European Parliament and the Council (GDPR) and *CXII of 2011 on Information Self-Determination and Freedom of Information Act* Three Princes, Three Princesses Foundation (hereinafter referred to as "**Data Controller**") for the purposes of the legality and security of the data applies the following data protection policy (hereinafter referred to as "**the Policy**"):

1. Data Management of Data Controller and its purpose

1.1 Activity of Data Controller, including data management based on purposes and ideals of Three Princes, Three Princesses Foundation was founded by Mária Kopp in 2009. Data Controller was created to solve the severe demographic crisis in Hungary. Its public interest objective is to encourage the birth of the desired children. Data Controller would like to form a social approach: it conveys values and messages that affirm the desire to having children; carries out educational activities for parents with multiple children especially for mothers to improve their labor market situation; lay the foundations for family policy measures affecting the decision-makers in the future with emphasizing the economic and social role of childbearing through scientific research and surveys.

The Data Controller is working on declaring the statement signed by the five parliamentary parties was created in 2013 by the Foundation and, if necessary, request the parties to confirm this document.

1.2. The Data Controller's data management purposes the Section 1.1 and personal data may be processed only to the extent necessary to achieve this purpose.

1.3. The Data Controller shall use the specified personal data in accordance with Section 1.1. and could not used them for other purpose. Publication of personal data to third parties or authorities - unless otherwise provided by law – is possible only with the prior express consent of the data subject. In addition, the Data Controller does not perform any data transfer activity.

1.4. The Data Controller is entitled to manage personal data in the following cases:

- if the data subject has given its consent in a declaration prepared by the Data Controller to its personal data is processed in accordance with Section 1.1.
- if the processing of personal data is necessary for the performance of a contract in which the party is a party, or before the conclusion of the contract it is necessary to take action at the request of the data subject;
- data management is necessary to fulfill the legal obligation of the Data Controller;
- data management is necessary for the protection of the vital interests of the data subject or another natural person;
- data management is necessary to enforce the legitimate interests of the Data Controller; or
- data management is necessary for the performance of a task of public interest.

1.5. Data Manager and its Contacts:

Three Princes, Three Princesses Foundation

Postal address / address: 1016 Budapest, Mészáros utca 58 / a.

Phone: + 36-1/610-98-15

E-mail: info@haramkiralyfi.hu

URL: www.haramkiralyfi.hu

1.6. The Data Controller performs the data collection activity by a declaration of consent as defined in clause 4 of these Regulations and by completing the data collection sheet used during lectures/conferences, workshops, social activities, family support as well as through the specified online interface (hereinafter referred to as "**Website**") defined in Section 9.1 of these Regulations.

1.7. In all cases, the legal basis for data management is the European Parliament and Council's *2016/679 General Data Protection Regulation (GDPR)* and *CXII of 2011 on Information Self-Determination and Freedom of Information*.

2. Privacy and Data Management Principles

2.1. Legality, fairness and transparency

The Data Controller performs the processing of personal data in a lawful and fair manner and in a transparent manner for the data subject.

2.2. Target binding and data saving

The Data Controller collects personal data in accordance with Section 1.1. for the explicit and legitimate purpose, and do not handle personal data in a way incompatible with the purpose. Data management of Data Controller is limited to this purpose.

2.3. Accuracy

The Data Controller does its best to erase or rectify inaccurate personal data for the purpose of data management.

2.4. Limited storage

The Data Controller stores the personal data in a form that allows identification of the data subjects only for the time necessary to achieve the purpose of processing personal data. Personal data is stored in electronic form. The maximum duration of personal data storage is 5 years.

2.5. Integrity and confidentiality

Data Controller manages personal data in a way that ensures the proper security of personal data by applying appropriate technical and organizational measures, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage.

2.6. Prohibition of special categories of personal data

Data Controller does not manage personal data referring to racial or ethnic origin, political opinion, religious or philosophical beliefs or trade union membership, and genetic and biometric data for the individual identification of natural persons, health

data and personal data relating to the sexual life or sexual orientation of natural persons.

3. Contribution Statement

3.1. If the data management has no other legal basis besides Section 1.4. Data Controller shall manage the data on the basis of the contribution declaration given by the data subject.

3.2. The Data Controller makes the declaration of consent available to the data subject in a clear form, with simple language, in a pre-formatted form, prior to the processing of personal data. Data Controller shall inform the data subject about the data management prior to giving consent.

3.3. The Contribution Statement and the related information are the following:

- the name and contact details of the Data Controller;
- the name and contact details of the Data Protection Officer;
- the purpose of processing personal data;
- the legal basis for data management;
- the duration of data management;
- educating the data subject about their rights to data management, access to data; and how to correct, delete, manage and remedy the data.

3.4. The purpose of the Contribution Statement is Data Controller can clearly demonstrate to the supervisory body that the data subject has contributed to the processing of his/her personal data.

3.5. The data subject can withdraw his/her declaration of consent at any time. The contribution withdrawals do not affect pre-revocation data management based on consent legality.

3.6. For a child under the age of 16, contribution to the processing of the child's personal data can be only given by the person who has parental control over the child.

3.7. The form of the Contribution Statement is contained in Annex 1 to these Regulations and the form for the withdrawal of the Contribution Statement is given in Annex 2 to these Regulations.

4. Rights of data subject

4.1. The Data Controller considers important to respect and enforce the data subject's right to data management thus informs them it respects the personal rights and in the course of its data management proceeds in accordance with the substantive and procedural rules of Hungarian and European Union law in force, in accordance with the present regulations in force and other internal regulations.

4.2. Right of access of the data subject

The data subject has the right to receive feedback from the Data Controller about whether personal data is being processed and, if such data is being processed, to have access to personal data. At the request of the data subject, the Data Controller shall make available to the data subject a copy of the personal data free of charge.

4.3. Right to rectification

The data subject is entitled to rectify the inaccurate personal data relating to him/ her without undue delay upon request. The data subject is also entitled to request the supplement of incomplete personal data.

4.4. Right to forget

The data subject is entitled to delete the personal data relating to him or her without undue delay upon request. The Data Controller undertakes to delete personal data relating to the data subject without undue delay if:

- personal data is no longer required under Section 1.1. of this Policy
- data subject withdraw its declaration of consent in the way that set out in paragraph 3.5.
- the data subject protests against the data management;
- personal data must be deleted to fulfill the legal obligation to the Data Controller.

The right to forget is not valid if data management is required to:

- exercising the right to freedom of expression and information for the purpose;
- fulfilling the obligation of the Data Controller or performing a task performed in the public interest;
- on the basis of public interest in the field of public health;
- for archiving in the public interest, for scientific and historical research purposes
- or statistical purposes;
- to present, validate or defend legal claims.

4.5. Right to restrict data management

The data subject is entitled to limit the data management on request, if

- the data subject disputes the accuracy of the personal data - in this case, the limitation applies to the period that allows the Data Controller to verify the accuracy of the personal data;
- data processing is unlawful and the data subject is against the deletion of the data and instead requests a restriction on their use;
- the Data Controller no longer needs personal data for data management purposes, but the data subject requests them for the submission, validation or protection of legal claims;

- the data subject objects to the data management - in this case the restriction applies to the period until it is determined whether the legitimate reasons of the Data Controller take precedence over the reasons of the data subject.

4.6. Right to data storage

The data subject is entitled to receive his /her personal data submitted to the Data Controller in a structured, widely used machine-readable format and is entitled to forward such data to another data controller without being prevented by the Data Controller whose data subject provided it.

4.7. Right to protest

The data subject is entitled, at any time, object to the processing of his or her personal data for reasons relating to his/her own situation. In this case, the Data Controller will not further process the personal data unless the data management is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject or which are related to the submission, validation or protection of legal claims.

4.8. Right to complain

The data subject shall have the right to lodge a complaint with the supervisory authority if the data subject considers that the processing of personal data concerning him / her is illegal. Supervisory Authority with Competence in Hungary:

National Authority for Data Protection and Freedom of Information

postal address: 1530 Budapest, Pf. : 5.

address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c

Phone: + 36 / 1-391-1400

Fax: + 36 / 1-391-1410

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

The supervisory authority will inform the data subject about the procedural developments related to the complaint.

4.9. Notification obligation for the Data Controller

The Data Controller informs all data subject about the correction, deletion of their personal data, or limitation of data management.

4.10. Right to compensation

If the Data Controller causes damage to others by unlawfully handling the data of the data subject or by violating the data security requirements, he or she is obliged to reimburse it.

If the Data Controller violates the data subject's privacy right by unlawfully handling the data of the data subject or by violating the data security requirements, the data subject may claim damages from the data controller.

The Data Controller shall be liable to the Data Controller for any damage caused by the Data Processor and the Data Controller shall also pay to the data subject the damages for the personal violation caused by the data processor. The Data Controller is exempted from liability for damages and the payment of damages if he proves that the damage or the violation of the personality rights of the data subject was caused by an unavoidable cause beyond the scope of data management.

There is no need to compensate for the damage and no claim for damages in so far as the damage caused by the victim or the violation of the right to the personality arose from the deliberate or gross negligence of the person concerned.

5. Data Management Register

5.1. The Data Controller keeps records of its data management activities.

5.2. The data management register contains the following information:

- the name and contact details of the Data Controller and the name and address of the Data Protection Officer and its contacts
- the purpose of data controller data management;
- description of categories of stakeholders and categories of personal data;
- deadlines for deleting different categories of data; and
- a general description of the technical and organizational measures.

5.3. The Data Controller manages the data management record in electronic form.

5.4. At the request of the supervisory authority, the Data Controller shall make a record of the data management available.

6. The privacy incident

6.1. In case of a data protection incident, the Data Controller shall notify it the Supervisory Authority without undue delay, at the latest 72 hours after the data protection incident has become known.

6.2. The Data Controller for Notification:

- describes the nature of the data protection incident and its number;
- communicate the name and contact details of the Data Protection Officer or other contact person providing further information;
- outlines the likely consequences of a data protection incident; as well as
- Provides information on the measures taken or planned by the Data Controller to remedy the data protection incident.

6.3 The Data Controller registers data protection incidents, indicating facts, effects, and any action taken on the data protection incident.

6.4. If the data protection incident is likely to pose a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the data subject of the data protection incident without undue delay.

7. Privacy Officer

7.1. Data subjects refer to the Data Protection Officer for all matters relating to the management of their personal data or the exercise of their rights.

7.2. The DPO is responsible for:

- Provides information and professional advice to the Data Controller and Data Controller employees;
- Controls the General Data Protection Regulation, as well as other domestic or EU data protection provisions, and the privacy of the Data Controller compliance with the relevant internal rules;
- provides professional advice;
- cooperates with the supervisory authority; and
- it acts as a point of contact for the supervisory authority in matters relating to data management and, where appropriate, for consultation on any other matter.

7.3. The Data Protection Officer is bound by the obligation of confidentiality in the performance of his duties.

7.4. The Data Protection Officer performs its tasks with due to the risk associated with data management operations, regard to the nature, scope, circumstance and purpose of data management.

7.5. The Data Controller ensures that the Data Protection Officer is properly and timely involved in all matters related to the protection of personal data.

7.6. The Data Controller supports the Data Protection Officer in the performance of its tasks as defined in point 2 of this Article, by providing it with the resources needed to carry out those tasks, personal data and data management access to operations and to maintain expert knowledge of the Data Protection Officer.

7.7. The Data Controller shall not release or penalize the Data Protection Officer in the performance of his/her duties. The Data Protection Officer is directly responsible to the Board of Trustees of the Data Controller.

7.8. The Data Protection Officer may also perform other tasks on the basis of the decision of the Board of Trustees of the Data Controller.

7.9. Data Protection Officer and contact details:

Andrea Péter

Postal address / address: 1016 Budapest, Mészáros utca 58 / a.

Phone: + 36-1 / 610-98-15

E-mail: info@harmokiralyfi.hu

URL: www.harmokiralyfi.hu/adatvedelem

8. Data processor

8.1. Data Controller uses data processors to facilitate the activities of Data Controller, where certain data processing activities are performed by data processors.

8.2. The Data Controller uses only data processors who provide reasonable assurance of the implementation of appropriate technical and organizational measures to ensure compliance with data requirements and to protect the rights of data subjects.

8.3. Data processors may not use a further data processor without prior written or general authorization by the Data Controller. In the case of a general written authorization, the data processors shall inform the Data Controller of any such planned change affecting the use or exchange of additional data processors, thereby enabling the Data Controller to object to these changes.

8.4. The Data Controller uses the data processing activity on the basis of a data processing contract.

8.5. Data processors and their contacts

EASTSIDE INFORMATIKA Trading and Service Limited Company

Headquarters: 2040 Budaörs, Széles u. 13/1.

Business Registration Number: 13-09-096828

Tax number: 13156754-2-13

Web: www.johonlapkeszites.hu

Phone number: (+36 23) 414 598

Activity: hosting provider

9. Online data management

9.1. Website

In addition to Data Management of presentations, conferences, workshops, social activities, family support, Data Controller also conduct data collection activities on its own Website in accordance with Section 1.1 of this Policy. The Data Controller as the webmaster of www.haromkiralyfi.hu website publish in this section the rules for managing the data of the users on the Website and the visitors of the Website in the framework of the services related to the website.

Data subjects can provide information and data about themselves on the Website in two ways:

- personal data explicitly provided or made available when using the Website's services;
- information provided to the Data Controller in connection with visiting and using of the Website.

The range of data processed is shown in the following table

Data Management	Scope of managed data	Duration of data management	Purpose of data management	Legal basis for data management
Blog Post	Name and E-mail address	In case of commenting on a blog post appear the name of the data subject, but the email address	Allow the data subject to write a comment.	Voluntary contribution of the data subject.

		is not. The data that data subject provide here will continue to be processed until data subject withdraw consent in writing.		
Blog post notification	E-mail Address	The data that data subjects provide here will continue to be managed as long as data subjects unsubscribe from the notification or withdraw his/her consent in writing.	In case of writing a comment, data subject subject have the option to request a notification if a new comment is posted to the blogpost.	Voluntary contribution of the data subject.
Contacting by email	Name, email address, phone number, message content, date of contact	The personal data is managed by the Data Controller until the data subject requests the deletion of his / her data	Identification and communication to send the response message to the data subject.	Voluntary contribution of the data subject.
Data collected when using a website	Technical data (relevant IP address, date and time of visit, browser type, viewed and previously visited web page address, which is logged automatically when logging in or out.	5 years from the date of logging.	Website and service development. These data are unsuitable for identification of data subject.	Voluntary contribution of the data subject.

In order to provide tailor-made service, the Data Controller has a small data packet on the data subjects's computer. Data Controller puts a cookie and reads it later. If the browser returns a previously saved cookie, the cookie provider has the option of linking the current visit of the user to the previous one, but only for its own content.

Cookies used by Data Manager:

- Session cookie: session cookies are automatically deleted after the data subject visits. These cookies are designed to make the Website work more efficiently and safely, so it is essential that certain functions of the Website or some applications work properly.
- Persistent cookie: a constant cookie is used by the Data Manager for a better user experience (eg providing optimized navigation). These cookies are stored for a long time in the browser cookie file. The duration of this depends on the settings the data subject uses in his/her web browser.

The purpose of cookies is to distinguish between the data subjects, to identify the current session of the users, to store the data provided during the session, and to prevent data loss.

The duration of data management for session cookies is until the website is completed, while in the other case, it is deleted. The person has the right to delete the cookie from her/his computer or to disable the use of cookies in his browser.

The Website may also contain links to external servers (not managed by data controllers or data processors), and pages on these links may place their own cookies or other files on the computer, collect data, or request personal information. For this reason, the Data Controller excludes all liability.

The collection and management of personal data and its use and identification with the person concerned will not take place during the placing of cookies.

9.2. Newsletter

The Data Controller is referred to in Section 1.1 of these Rules also engaged in online advertising activities (hereinafter referred to as "Newsletter"). Subscribing to the Newsletter is based on voluntary contributions.

In order to enhance the data security of the Data Controller, data subjects use a two-step subscription, in which he/she will receive a confirmation e-mail with the name and e-mail address of the subscriber and the checkbox ticking, which will allow them to finalize their consent for the data controller to handle their data legally. The Data Controller does not send any unsolicited advertising message and data subjects can unsubscribe from the Data Controller's Newsletter free of charge without limitation or justification. In this case, the Data Controller considers as if the person concerned had used the provisions of paragraph 4.4. Unsubscribe is available by clicking the link in the newsletter.

The Data Controller ensures that the data managing by its is accurate and complete. However, this clause does not oblige the Data Controller to prevent subscribers from unauthorized use of others' personal data. Based on these, the Data Controller does not take responsibility for the misuse of the personal data of others.

9.3. Community sites

The Data Manager is available on the following community sites:

- Facebook (<https://www.facebook.com/haromkiralyfi/>)
- The use of social networking sites, contacting the Data Controller, and other activities permitted by the community site are based on voluntary contributions.
- The Data Controller communicates with data subjects via the social network only if the purpose of the managed data becomes relevant and if the data subject searches the Data Manager through the social network.

The purpose of the presence on the social networking sites and the related data management is the sharing, publishing and marketing of the content on the Website. With the help of the community site, the data subject can also be informed about the latest projects.

The data subject voluntarily contributes to following and managing the contents of the Data Controller based on the terms of the community site.

By using an exemplary definition, the data subject can sign up for the news feed posted on the Facebook page by clicking on the "like" / "like" link on the page, and thereby contributing to publishing news and offers from the Data Controller on their own wall. And data subject can unsubscribe by clicking on the "don't like" link, and he/she can use the settings of the message wall to delete unwanted news feeds that appear on the message wall.

The data subject can be evaluated the data controller in a numerical way because the community site allows it.

10. Other Provisions

In the issues not regulated by these Rules, the Hungarian legislation in force at all times, in particular the 2011 Law on Information Self-Determination and Freedom of Information. CXII. (Inf.) is authoritative.

Budapest, May 25, 2018

Dávid Mészáros
Founder