

## General Information Notice on Processing

The purpose of this General Information Notice on Processing (hereinafter referred to as the **Information Notice**) is to inform the data subject what data of the data subject are collected by Antall József Knowledge Centre of Political and Social Sciences Foundation (registered seat: 1126 Budapest, Böszörményi way 9. 4/25.; registration number: 01-01-0010962; hereinafter referred to as the **Foundation** or **AJTK**), how such data are processed or used by it and to whom your personal data are made available by it.

### 1. Preamble

The high-level protection of the personal data, in accordance with the provisions of Act CXII of 2011 on the freedom of information (hereinafter referred to as the **Data Protection Act**) and the General Data Protection Regulation No (EU) 2016/679 of the European Parliament and the Council (hereinafter referred to as the **Regulation** or the **GDPR**) is of particular importance for the Foundation.

In using the service provided to the clients of AJTK, processing of the personal data available to AJTK is a necessary and essential condition for using the product or service; in case of refusal of or failure to provide such data, the product or service cannot be used.

Certain concepts used by the Information Notice are included in this Information Notice.

If the data subjects wish to be notified about the Foundation's events, they subscribe to the newsletter or provide their contact data for the purposes of business cooperation and contact and give their express consent to the Foundation, processing shall be subject to the following provisions.

**The Foundation expressly raises the data subjects' attention to the circumstance that where personal data are processed for direct marketing purposes, data subjects shall have the right to object at any time to processing of personal data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.**

### 2. Definitions

**personal data:** means any specific data relating to an identified or identifiable natural person and any conclusion which may be drawn therefrom regarding the data subject. In the course of processing, personal data preserves such quality as far as its relationship with the subject may be restored. The relationship with the data subject may be restored if the controller has the technical conditions that are necessary for restoring.

**special data:** means personal data revealing racial or ethnic origin, political opinions, affiliation with a political party, religious or philosophical beliefs, or trade union membership, and the processing of data concerning one's sex life, health or pathological addiction and criminal data.

**data subject:** any natural person who is identified or identifiable directly or indirectly based on specific personal data.

**processing:** any operation which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, storage, alteration, use, retrieval, disclosure by transmission, publication, alignment or combination, blocking, erasure or destruction, as well as hindering further use of the data, preparing pictures, audio and picture recordings and recording physical characteristics that are suitable for identifying the person.

**controller:** the natural or legal person, or entity not having legal personality which, alone or jointly with others, determines the purposes of the processing of personal data, makes the data processing decisions and enforces them or make them enforced by the processor.

**processing:** carrying out the technical tasks related to the processing activities.

**processor:** the person or organisation which processes the data under an agreement concluded with the controller, including any agreement concluded under a legal provision.

**data transfer:** making the data available to a specific third party.

**consent:** any freely given, specific, informed and unambiguous indication of the data subjects wishes by which they signify agreement to the processing of personal data relating to them for all or specific operations. Consent to processing special data shall be subject to a written form.

**proper information:** prior to data processing, the data subjects shall be informed whether the processing is based on their consent or is mandatory, furthermore, the data subjects must be informed clearly and in details about every fact related to the processing of their data, including in particular the purpose and legal basis of processing, the persons authorised to control and process data, the period of processing, and who has the right to access the data. The information should also cover the data subject's rights in relation to data processing and the remedies available to them.

**objection:** the data subjects' statement by which they object to processing of their personal data and request termination of the processing or erasure of the data processed.

**data security:** system of technical and organisational solutions against the unauthorised acquisition, modification and destruction of the data.

**data erasure:** making the data unrecognisable in a manner that they may no longer be restored.

**data blocking:** attaching an identification mark to the data for the purpose of restricting their further processing permanently or for a given period.

**third country:** any state that is not a member of the European Economic Area.

### **3. Scope of This Information Notice**

This Information Notice covers the data subjects who wish to be notified about the Foundation's events, subscribe to the newsletter or provide their contact data for the purposes of business cooperation and contact with the Foundation, as well as to their representatives, agents and authorised persons.

### **4. Processor**

For the purposes specified in this Information Notice, the Foundation as controller acts in respect of your personal data.

#### **The Foundation:**

Registered seat: 1126 Budapest, Böszörményi way 9. 4/25

Registration number: 01-01-0010962

Name of the registering court: Budapest-Capital Regional Court

Tax number: 18024681-2-43

Phone number: +36 20 310 8776  
Email: ajtk@ajtk.hu

## 5. Purpose and Legal Basis of Processing

### General Processing Guidelines

The processing within AJTK's activities is based on a freely given consent or statutory authorisation. In case of processing based on a freely given consent, the data subjects may withdraw their consent in any phase of the processing. In certain cases, the processing, storage and transfer of a specific scope of the data provided is allowed by the law; we notify our client separately of such circumstance.

We hereby recall the attention of those who disclose data to AJTK, that if they disclose personal data other than their own personal data, they are obliged to obtain the data subject's consent.

Our data protection principles are in accordance with the applicable data protection laws, including in particular the following:

- Act CXII of 2011 on informational self-determination and freedom of information
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 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 (the GDPR);
- Act V of 2013 on the Civil Code (the Civil Code);
- Act C of 2000 on accounting (the Accounting Act);
- Act LIII of 2017 on the prevention and combating of money laundering and terrorist financing (the AML Act).

The purpose of processing falling under the Information Notice is to inform the data subjects about the products and services of AJTK and of its partners, forward their advertisements, carry out market research, transfer information relating to AJTK's activities and services via electronic mail and to provide the services ordered by the data subjects to such data subjects.

Legal basis for processing:

- **the data subject's voluntary consent** that you are entitled to withdraw at any time; and
- **performance of the agreement concluded with the data subject**, or
- **performance of other civil law obligations** applying to AJTK.

## 6. Scope of Data Processed

For the purpose provided in the Information Notice, AJTK processes your following personal data in order to supply its services:

- name such as title, last name, first name, company name – such data are processed for identifying the data subject;
- contact data such as address (ZIP code, locality, address), phone number, email address, web address – such data are processed in order to keep contact with the data subject;
- data related to AJTK's services – such data are necessary in order to supply the services;
- data of the agreement containing AJTK's service – such data are processed in order to create, maintain or terminate the contractual relationship with you.

Such data shall be processed in order to identify you, to contact you and to supply services to you.

### **Personal Data to Be Provided in Case of Subscription to the Newsletter:**

- Name
- Corporate email address

**Personal Data to Be Provided During Registration:**

- Name
- Corporate email address
- Corporate phone number:

**Further Data Processing**

If AJTK wishes to perform further processing, it shall provide prior information on the material circumstances of the processing (the legal background of processing and the legal basis thereof, the purpose of processing, the scope of data processed, the period of processing).

Please note that the Controller shall satisfy the written data requests submitted by the authorities based on the law. Controller shall keep records of data transfers in accordance with Section 15(2) to (3) of the Data Protection Act (to which authority, what personal data, on what legal basis, when was transferred by the Controller); Controller shall provide information on the content of such records upon request unless this is excluded by the Act.

**7. Physical Data Storage Location(s):**

We may process personal data (that is data which may be linked to you) as follows: in connection with maintaining the Internet connection, the technical data relating to the computer, browser and Internet address used and the pages visited by you are generated automatically in our computerised system, and also you may provide your name, contact details or other data if you wish to contact us personally during the use of the website.

The data recorded technically during system operation are the data of the data subjects' computers which are generated during registration and are recorded as automatic results of the technical processes by the system of Google Analytics. The system logs automatically the automatically recorded data upon entry and exit, without the data subjects' separate statement or action. This data together with other personal user data cannot be combined, with the binding exceptions provided by law.

Only AJTK may access the data.

**8. General Provisions**

AJTK shall not process special data for the purposes provided in the Information Notice.

AJTK may process the disclosed personal data as long as the purpose exists, but no later than within the statutory deadline (for 8 years under the Accounting Act) or until withdrawal of the data subject's consent. Unless otherwise provided by law, AJTK retains your personal data during the effectiveness of its service agreement and until the civil law prescription (for 5 years in general) after termination of such agreement.

In addition to the cases provided in this Information Notice, the personal data shall not be transferred to third parties. The personal data provided may be accessed only by the members of the Foundation and the Foundation's employees for whom knowing the personal data is essential in order to achieve the purpose of processing.

In order to ensure the security of the personal data processed, AJTK shall take the technical and organisational measures and set the procedural rules that are necessary to enforce the Hungarian and EU data protection laws.

AJTK protects the personal data processed against unauthorised access, alteration, transfer, disclosure to the public, erasure or destruction, as well as incidental destruction and damage.

It is important that the data contained in the records shall be accurate and actual. If your personal data change during the effectiveness of the agreement applicable to the relevant service, the Foundation shall be informed of such change.

Data subjects give their express consent to be contacted by the Foundation directly by using the contact details provided, via telecommunication devices and/or electronically and/or in writing, for the purposes of carrying out its marketing activity.

During the processing set out in this Information Notice, the Foundation may transfer your personal data to the following processors:

Processor's name and contact details	Services provided by the processor	Scope of data transferred to the processor	Processing period
<b>Antall József Knowledge Centre of Political and Social Sciences Foundation</b>  1126 Budapest, Böszörményi way 9. 4/25 <a href="mailto:ajtk@ajtk.hu">ajtk@ajtk.hu</a> +36 20 310 8776  <b>WP Online Creative Digital</b> H-1053 Budapest, Ferenciek tere 7-8.	data recording, server supply, mailing, delivery, ensuring the technical background, marketing.	full scope of the data specified in section 6 above	The period of the service contract until erasure of the personal data (withdrawal) or the civil law prescription unless otherwise provided by law
<b>Antall József Knowledge Centre of Political and Social Sciences Foundation</b>  1126 Budapest, Böszörményi way 9. 4/25 <a href="mailto:ajtk@ajtk.hu">ajtk@ajtk.hu</a> +36 20 310 8776	performance, settlement, control and marketing of the services related to the agreement	full scope of the data specified in section 6 above	The period of the service contract until erasure of the personal data (withdrawal) or the civil law prescription unless otherwise provided by law

## 9. Special Provisions on Certain Processing Operations

### 9.1. Performance of the Agreement

In the interest of the contractual relationship between the Foundation and the clients and in order to perform contractually, the Foundation transfers the data indicated in this Information Notice to the Processor(s) under a separate agreement concluded with the Processor.

### **9.2. Sending Newsletters**

The Foundation sends a newsletter to its clients and other business partners and interested parties who are in contact with it, based on their prior, freely given, specific and clear consent and record the abovementioned data for such purpose.

The Processor specified as such in this Information Notice shall be entitled to carry out the technical operations relating to compilation and sending of the newsletter under a separate agreement between the Foundation and the Processor.

Registration number of the processing: NAIH- 91985 /2015

### **9.3. Sending Materials Relating to the Foundation's Professional Events**

The Foundation organises professional events regularly for the clients and other business partners and invitees who are in contact therewith. The Foundation sends invitations and aids based on data subjects' prior, freely given, specific and clear consent and process and record the abovementioned data for such purpose.

Registration number of the processing: NAIH-92291/2015

### **9.4. Data Processed for the Purpose of Business Contacts**

In order to build business contacts in addition to client data, the Foundation processes also other persons' contact data (phone, email address), their data indicated on their name cards (company name, position), collect them either on paper or electronically, based on the data subject's freely given consent.

Registration number of the processing: NAIH-98353/2016

Data subjects give their express consent to be contacted by the Foundation directly by using the contact details provided, via telecommunication devices and/or electronically and/or in writing, for the purposes of building business and other contractual relationships.

## **10. Rights of Data Subject**

### **10.1. Data Subjects' Rights and Remedies in Relation to Data Processing**

Data subjects shall have the following rights:

- a) request information on processing of their personal data;
- b) request rectification of their personal data;
- c) request erasure or restriction of their personal data;
- d) avail of their right to data portability;
- e) object to the processing of their personal data;
- f) turn to AJTK, the data protection supervisory authority or court where their rights are breached.

### **10.2. Right of Access by the Data Subject**

Data subjects may request a feedback on whether their personal data are being processed. If any such processing is ongoing, data subjects may request information about

- a) the purpose of processing;
- b) categories of the personal data concerned;
- c) who may know the personal data, including in particular whether they are transferred into a third country;
- d) the period of processing, or if that is not possible, the criteria used to determine that period;

- e) their right to request from the controller rectification or erasure of personal data or restriction of processing personal data concerning them or to object to processing of such personal data;
- f) the right to lodge a complaint with a data protection supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, at least in these cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

#### **10.3. Right to Rectification**

At the data subjects' request, AJTK shall rectify, without delay, the inaccurate personal data concerning such data subjects or, taking into account the purpose of processing, they may request the integration of incomplete personal data amongst others through an additional statement.

#### **10.4. Right to erasure ('right to be forgotten') and the right to restriction**

Data subjects shall have the right to obtain from the controller the erasure of personal data concerning them without undue delay and the controller shall have the obligation to erase personal data without undue delay where:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) data subjects withdraw their consent underlying the processing and there is no other legal ground for the processing;
- c) data subjects object to the processing and there are no legitimate overriding reasons for processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in EU or Member State law to which the controller is subject;
- f) personal data are collected directly in relation to information society services offered for children.

The right to erasure cannot be enforced, if the processing is necessary

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation under EU or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

Where the controller has made the personal data public and is obliged to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

#### **10.5. Right to Restriction of Processing**

Data subjects shall be entitled to restrict the processing in the following cases:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) AJTK no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

#### **Notification Obligation Regarding Rectification or Erasure of Personal Data or Restriction of Processing**

AJTK shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. AJTK shall inform the data subject about those recipients if the data subject so requests.

#### **10.6. Right to Data Portability**

Data subjects shall have the right to request receipt of the personal data provided to AJTK in a structured, commonly used and machine-readable format and have the right to transfer those data to another controller or to make AJTK transfer them directly to another controller.

#### **10.7. Right to Object**

Data subjects shall be entitled to object, on grounds relating to their particular situation, at any time to processing of their personal data by AJTK based on legitimate interests or in connection with profiling. AJTK shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

#### **10.8. Communication of a Personal Data Breach to the Data Subject**

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. This information shall contain the nature of the data protection breach using a clear and plain language and at least the following data shall be disclosed:

- a) communicate the name and contact details of the data protection officer or other contact person from whom additional information may be obtained;
- c) describe the likely consequences of the personal data breach;
- d) describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the data subject shall not be required if any of the following conditions are met:

- a) the controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access them, such as encryption;
- (b) the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise;



c) it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

#### **10.9. Automated Individual Decision-Making, Including Profiling**

Data subjects shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

Such right shall not apply if the decision:

- a) is necessary for entering into, or performance of, an agreement between the data subject and the data controller;
- b) is authorised by EU or Member State law to which the controller is subject, and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) is based on the data subject's explicit consent.

In the cases referred to in points a) and c) above, the data controller shall implement suitable measures to safeguard the data subjects' rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express their point of view and to contest the decision.

#### **10.10. Restrictions**

EU or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights (Articles 12 to 22, Article 34, Article 5) when such a restriction respects the essence of the fundamental rights and freedoms.

#### **10.11. Legal Remedies**

We propose that you avail of your right to object and file a complaint to AJTK before initiating the procedure of any authority or court.

In connection with the exercise of your rights, you may act as follows before AJTK:

- by mail sent to AJTK's registered seat or postal address;
- in the form of an electronic letter sent to [ugyfelszolgalat@ajtk.hu](mailto:ugyfelszolgalat@ajtk.hu) email address;
- by phone, subject to identification and audio recording, on the phone number published on AJTK's website, as well as
- personally, at AJTK's registered seat and in the workhours.

##### **10.11.1. Right to Lodge a Complaint with a Supervisory Authority (Right to Remedy by an Authority)**

Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them.

Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

Where proceedings are brought against a decision of a supervisory authority which was preceded by an opinion or a decision of the Board in the consistency mechanism, the supervisory authority shall forward that opinion or decision to the court.

**10.11.2. Right to an Effective Judicial Remedy Against a Supervisory Authority**

Data subjects shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their respective habitual residence, place of work or place of the alleged infringement if the data subjects consider that the processing of personal data relating to them infringes this Regulation. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy.

**10.11.3. Right to an Effective Judicial Remedy Against a Controller or Processor**

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, each data subject shall have the right to an effective judicial remedy where they consider that their respective rights under the Regulation have been infringed as a result of the processing of their personal data in non-compliance with that Regulation.

Proceedings against the controller or the processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subjects have their respective habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

**National Authority for Data Protection and Freedom of Information**

Data subjects may file a complaint in relation to the processing of their personal data to the data protection supervisory authority (National Authority for Data Protection and Freedom of Information; 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1374 Budapest, Pf. 603. email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

**Court**

Data subjects may turn to court against AJTK or, in connection with the processing operations falling within the processor's scope of activities, against the processor if they consider that AJTK or the processor engaged by it or acting on its instructions processes their personal data in breach of the provisions on personal data processing, set out by law and in the binding legal acts of the European Union. Data subjects may initiate litigation also before the regional court of their domicile or residence, according to their own choice. The court acts in such case out of turn. AJTK shall be responsible for proving that the processing is in compliance with the law.

**11. Answering the Data Subject's Request**

AJTK shall inform the data subject about the actions taken in relation to the requests set out in subsection 11 and the complaint submitted under subsection 11 without delay, but in any case within not more than one month from receipt of the request; such deadline may be extended by not more than 2 months depending on the complexity of the request and the number of requests. AJTK shall inform the data subject about the extension of the deadline for reply within 1 month from receipt of the request.

If AJTK decides not to take action on the request of the data subject, it shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking

action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

## **12. Data Security Measures**

AJTK states that it has taken appropriate security measures to protect the personal data against unauthorised access, alteration, transfer, disclosure to the public, erasure or destruction, as well as incidental destruction and damage and inaccessibility due to the change of applied technics.

## **13. Technical Data**

For the processing of personal data, AJTK chooses and operates the IT devices used during the supply of the service in a manner that:

- the processed data is available to the authorised persons (availability);
- the authenticity and authentication of such data is ensured (authenticity of the processing);
- it can be verified that such data is unchanged (data integrity);
- such data is protected against unauthorised access (confidentiality of the data).

AJTK protects the data through appropriate measures against unauthorised access, alteration, transfer, disclosure to the public, erasure or destruction, as well as incidental destruction.

AJTK protects the security of processing by organisational and structural measures which provide a level of protection that is appropriate in view of the risks arising in relation to processing. During the processing AJTK preserves secrecy: protecting the information in a manner that only authorised persons may access such information; integrity: protecting the accuracy and completeness of the information and the method of processing; availability: providing real access to the information requested when the authorised person has necessity to do so and making available the related means.

## **14. Cookies used on [www.ajtk.hu](http://www.ajtk.hu) website**

Cookies can be found in certain areas of the [www.ajtk.hu](http://www.ajtk.hu) website. Cookies are files which store information on your web browser.

For example, cookies enable the website to detect if you have visited such site before and they help us understand which part of the website is the most popular one as they make visible the pages the visitors enter and the time that they spend there. By studying such parameters, we can adapt the website better to your needs and provide an even more versatile user experience to you. With cookies, we can ensure also that the information appearing on your next visit will correspond to your user expectations (without identifying you personally).

When you visit our website, we may automatically collect also technical information from which you cannot be identified. For example, the name of another website which directed you to our website, the location of access to the website, the searches carried out on the website. Collecting such information helps us recognise the common searches preferred by our website users without using their personal data. Such information is used only internally. Anonymous or general data from which you cannot be identified are not considered to be personal data, so they do not fall under this Information Notice.

You can set your web browser in order to accept all cookies, refuse all of them or notify you if a cookie is placed on your computer. Every web browser is different so use the "Help" menu of your browser to change your cookies settings. Further information on the nature of cookies and on how to disable them may be found on the <http://www.youonlinechoices.com/hu/> website. The [www.ajtk.hu](http://www.ajtk.hu) website was created for use with cookies, so disabling such cookies may impact the usability of the website and prevent you from making full use of such website.

### **Essential (session) cookies**

The purpose of these cookies is to enable visitors to browse fully and smoothly the website, use website functions and the services available there. Such cookie types are valid until the end of the session (browsing); with closing the browser, such cookie type is automatically removed from the computer and the other devices used for browsing.

### **Third party cookies (analytics)**

AJTK Consulting Kft. uses also Google Analytics as third party cookies on its website. By using the Google Analytics statistical service, it collects information on how users use the [www.ajtk.hu](http://www.ajtk.hu) website.

Data are used for the purposes of developing the website and improving user experience.

Such cookies are also stored in the browser on the visitor's computers and on other devices used for browsing until they expire or are removed by the visitor.

Google Analytics provides other opportunities to unsubscribe from Google Analytics services:

<http://tools.google.com/dlpage/gaoptout?hl=en-GB>.

**In the most popular browsers, the menu items for disabling or deleting cookies are as follows:**

- Mozilla Firefox: Settings/Privacy & Security/History/Delete history
- Google Chrome: Settings/Advanced/Privacy & Security/Delete browser data
- Internet Explorer: Start menu/Control panel/Internet settings/Browsing history/Delete

Google Analytics provides other opportunities to unsubscribe from Google Analytics services:

<http://tools.google.com/dlpage/gaoptout?hl=en-GB>.

Cookies used on [www.AJTK.hu](http://www.AJTK.hu) website can be found in [the cookie table](#).

## **15. Security of Processing**

AJTK shall act in order to operate its IT system safely and to protect the data based on the Data Protection Act, the GDPR and other applicable Hungarian and European Union laws.

In order to protect and secure personal data, AJTK takes internal regulatory (protection of data and secrets, information security, access rights, etc.), organisational, technical and educational measures for data security. Such measures include e.g. technologies making up the IT security infrastructure, e.g. regulating access for security, system for the management of authorisations which limit the access rights to the extent necessary for work in respect of certain employees, certain separations, protections against data leakage, computer identifiers, password, screen protection, logging, etc.

For the purpose of protecting against certain risks (e.g. phishing letters, viruses and spyware, etc.), filtering software are used. Such applications may occasionally result e.g. in blocking private letters arriving from outside by the filtering software.

In order to further protect the data subjects' personal data, AJTK engages a data protection officer who is responsible to AJTK's management and shall not accept instructions in relation to the performance of his or her duties.

If processing is carried out by another person in AJTK's name, such controller may only involve processors who or which provide appropriate safeguards for implementing the appropriate technical and organisation measures which ensure compliance with the requirements set out in 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 (the GDPR) and protection of the data subjects' rights;

Data subjects exercise their abovementioned rights by using a contact of the Foundation.

Issues not regulated under this Information Notice shall be governed by the provisions of Hungarian and European Union law.

#### **16. Representations and Warranties**

By knowing this Information Notice, you give your express and clear consent to AJTK to process the data provided by you and to transfer such data to the Processors. Processors shall provide an adequate level of data protection and data security in accordance with the applicable laws. Processors shall process the data transferred in compliance with AJTK's instructions.

You declare that you have become aware of the content of this Information Notice and accept it as binding on you. You acknowledge and agree that, in compliance with the applicable laws, AJTK shall be entitled to transfer the data collected based on this consent to the Processors for the purposes of processing. By knowing this Information Notice, you expressly give your consent to AJTK to process your data as indicated above, including the transfer of such data. The consent given by getting familiar with this Information Notice is considered to be an informed consent.

You declare that you transfer/have transferred the data of your company, your company's clients, contact persons, employees and other representatives to AJTK based on such persons express, clear, freely given and appropriate consent. You acknowledge that if you have transferred any data to AJTK in connection with satisfaction of such consent which may be considered as a personal data, trade secret or bank secret of a third party, you are obliged and responsible for obtaining such third party's consent to the data transfer or allowing AJTK to know, process and transfer such data to the Processors in accordance with the foregoing.

AJTK and the Processors do not transfer your data to third parties unless such transfer is allowed or prescribed as mandatory by law. The data shall not be known to anyone except for AJTK's and the Processor's employees, and AJTK's processors. Processing carried out by AJTK fully complies with the provisions of the Data Protection Act and other special data protection laws.

By knowing this Information Notice, you exempt AJTK and its Processors from the provisions regarding trade, securities related and bank secrets and give your consent to AJTK and its Processors to know fully your data, information and documents constituting trade, securities related and bank secrets.

#### **17. Other Provisions**

We provide information on processing operations that are not listed in this Information Notice upon recording of such data. We hereby inform our clients that based on an authorisation received from court, the prosecutor, investigating authority, the authority dealing with administrative offences, the administrative authority, the National Authority for Data Protection and Freedom of Information, the National Bank of Hungary or by law, other bodies may request the controller to give information, disclose and transfer data or to make documents available. AJTK discloses to the authorities only the personal data that is essential for achieving the purpose of the request and only to the extent necessary therefor, provided that such authority has indicated the exact purpose and the scope of data sought.

**18. Amendment of this Information Notice**

Within the limits set by law, AJTK may amend the Information Notice from time to time to make it compliant with the changes in AJTK's legal obligations and activities regarding the processing of the data subjects' personal data. Please control regularly the validity of the Information Notice in order to know any changes.

The last amendment to this Information Notice was made on 28 April 2022.

**Antall József Knowledge Centre of  
Political and Social Sciences  
Foundation**