DATA PROCESSING POLICY

- MCC Conference on the Freedom of Expression in the Digital Age (November 11, 2021) – registrants and participants -

Mathias Corvinus Collegium Alapítvány (seat: 1016 Budapest, Somlói út 49-53.; tax number: 18157918-2-41; website: http://www.mcc.hu/; phone: 06-1-372-01-91; e-mail: info@mcc.hu; represented by: Péter Lánczi deputy director general) is an educational and talent nurturing institution whose priority is to maintain the Mathias Corvinus Collegium to ensure its operating conditions and institutional development goals.

Mathias Corvinus Collegium Alapítvány organizes the Conference on the Freedom of Expression in the Digital Age (hereinafter referred to as the "**Conference**") where personal data provided in relation to the registration and participation shall be processed in line with 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 as hereinafter set forth:

Act and regulation and their abbreviations used and considered in relation to the Policy

the Act	Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as '**Act**')
GDPR	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 (General Data Protection Regulation) (hereinafter referred to as '**GDPR**')

Definitions

Definitions in the present Policy meet definitions of Article 4 of GDPR.

Where definitions of GDPR in force are different from the definitions of the present policy, definitions of GDPR in force shall prevail.

I. Data controller, data processor and contact details

Data Controller (hereinafter referred to as „**Controller"**):	
name:	**Mathias Corvinus Collegium Alapítvány**
seat:	**1016 Budapest, Somlói út 49-53.**
postal address:	**1518 Budapest, Pf. 155**
phone:	**+36 1 372 0191**
registration number:	**01-01-0006421**
represented by:	**Péter Lánczi deputy director general**
e-mail:	**info@mcc.hu**

Data processor (hereinafter referred to as „**Data processor"**):	
The personal data may be transferred for procession to	
- website operator	**Webonic Kft**. (company registry number: 01-09-381419; tax number: 25138205-2-07

II. Data subject, personal data, purpose of processing, legal basis for processing, period of processing

Data subject: registrants and participants of the Conference

Personal data	Purpose	Legal basis	Period
first name, last name, title, workplace (company name)	Registration to the Conference.	Point a) section (1) of Article 6. of the GDPR (consent)	1 year from the Conference
e-mail	Contact purposes and registration to the Conference.		
pictures, audio, and video recordings	Promotion and presentation of the Conference and placing, displaying and playing of the pictures, audio and video recordings on the media managed, operated by and reserved for the Controller and/or the Conference (especially: Facebook, Instagram, website of Mathias Corvinus Collegium).		until withdrawn

Information on transfer of personal data to a third country or international organisation (point f) section (1) of Article 13. of the GDPR)	personal data is not transferred to third country or international organisation
The recipients or categories of recipients of the personal data:	personal data will not be disclosed to other than the Controller's employees and Data processor
Means of processing:	electronic
Information related to point e) section (2) of Article 13. of the GDPR:	the provision of personal data is not a statutory or contractual requirement, it is not a requirement necessary to enter into a contract, and the data subject is not obliged to provide the personal data
Information related to point f) section (2) of Article 13. of the GDPR:	there is no automated decision-making

III. Principles

1. The Controller processes personal data in accordance with principles of good faith and fair dealing and transparency and subject to law in force and provisions of the present Policy.
2. The Controller processes personal data only on the basis of the present Policy and for a specific purpose(s) and does not go beyond them.
3. If the Controller intends to use personal data for purpose(s) other than the original purpose(s), the Controller informs the data subject of such a purpose and use and obtain the previous and express consent of the data subject (where there is no other legal basis determined by GDPR) and the Controller allows the data subject opportunity to defy the use of personal data.
4. The Controller does not control personal data provided, person who provided the personal data, shall be liable for adequacy.

5. The Controller does not transfer personal data, except that the Controller is entitled and obliged to transfer or forward personal data available to and properly stored by the Controller to competent authority where transfer and forward of personal data is determined by law or legally binding order of authority. Controller shall not be liable for such a transfer or its consequences.

6. The Controller ensures the security of personal data, takes all technical and organizational measures and establishes rules of procedure that guarantee protection of recorded, stored and processed personal data, and prevent accidental losses, destruction, unauthorised access, unauthorised use, unauthorised alteration and unauthorised dissemination.

IV. Rights of the data subject

1. The data subject may exercise right in the following ways:
   - e-mail
   - by post
   - in person

2. Rights of the data subject

2.1. Right of information and access to personal data

The data subject may at any time request the Controller to provide information on data processed by the Controller or the data processor involved by or according to the order of the Company, purpose of the processing, legal basis for the processing, period of processing, name and address of data processor, activity of data processor related to data processing, the circumstances, effect of a personal data breach, measures taken for averting personal data breach, furthermore, where personal data is transferred the legal basis for and recipient of transfer of personal data.

In relation to the above, the data subject may request a copy of his/her processed data. In case of an electronic request the Controller executes the request first electronically (PDF format), except where the data subject requests expressly otherwise.

The Controller already draws attention to the fact that if the above right of access affects adversely the rights or freedoms of others, including in particular trade secrets or intellectual properly, the Controller may refuse the execution of the request, to the extent it is necessary and proportionate.

2.2. Right to rectification and modification

The data subject may request the rectification, modification and completion of personal data processed by the Company.

2.3. Right to data portability

The data subject has the right to receive the personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company.

Furthermore, the data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

2.4. Right to erasure ('right to be forgotten')

The data subject may request the erasure of one or all personal data concerning him or her.

In this case, the Controller erasures the personal data without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;
- data processing is based on legitimate interest of the Controller or third person but the data subject objects to the processing and (except objection to processing related to direct marketing) there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation.

The Controller informs the data subject of the refusal to the request of erasure in any event (e.g. data processing is required for the establishment, exercise or defence of legal claims), indicating the reason of the refusal. Erasure of personal data is executed that after fulfilment of request of erasure personal data (erasured) cannot be restored.

In addition to the exercise of right to erasure, the Controller erases personal data if the data processing is unlawfully, the purpose of data processing is no longer exists, data storage period determined by law is already expired, it is ordered by court or authority.

2.5. Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- 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;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Controller 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;
- the data subject has objected to processing pending the verification whether the legitimate grounds of the Controller override those of the data subject

Where processing has been restricted, such personal data won't be processed or will, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. A data subject will be informed by the Controller before the restriction of processing is lifted.

2.6. Right to object

Where the legal basis for processing is legitimate interest of the Controller or third person (except compulsory data processing) or data is processed for direct marketing, scientific or historical research purposes or statistical purposes, the data subject, has the right to object to processing of personal data concerning him or her. Objection may be rejected if the Controller demonstrates

- compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or
- that data processing is related to the establishment, exercise or defence of legal claims of the Company.

The Controller examines the lawfulness of the objection of the data subject and where the objection is grounded, the Controller stops data processing.

2.7. Right to legal remedy

See Section VII.

2.8. Right to withdraw the consent

The data subject shall have the right to withdraw his or her consent to the processing at any time, provided that the withdrawal of the consent does not affect the lawfulness of the data processing prior to the withdrawal based on the consent.

3. The MCC shall immediately examine the request submitted as above, take a decision on the fulfilment or refusal of the request, take the necessary measures and inform the data subject. If the request is rejected, the information shall include the legal basis for the refusal, the reasons and the legal remedies for data subject are available.

4. The MCC shall inform any recipient to whom or with whom the personal data have been communicated of the rectification, erasure or restriction of data processing, unless this proves impossible or requires a disproportionate effort.

V. Personal data breach

1. The MCC shall immediately report a personal data breach to the Hungarian National Authority for Data Protection and Freedom of Information, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of data subjects.

2. The Controller registers personal data breach and the measures related thereto.

3. If the personal data breach is serious (i.e. presumably involving a high risk to the rights and freedoms of the data subject), the Controller shall inform the data subject without undue delay.

VI. Modification of the Policy

1. The Controller reserves the right to modify the present Policy through an unilateral decision at any time.

2. If the data subject does not agree with the modification, he/she may request the erasure of his/her personal data as determined above.

VII. Legal remedies and enforcement

1. The Controller may be contacted for the purpose of any question or comments related to data processing using contact details above.

2. In case of any violation related to data processing, the data subject may make a complaint to the competent data protection supervisory authority of the Member State of residence, workplace or the place of the alleged violation.

   In Hungary, complaint shall be submitted to Hungarian National Authority for Data Protection and Freedom of Information („NAIH", address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., phone: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

   The data subject may bring the following cases before court:
   - violation of rights
   - against the legally binding decision of the supervisory authority
   - if the supervisory authority does not deal with the filed complaint or does not inform the data subject of aspects or result of the procedure related to the filed complaint within 3 months