

PRIVACY POLICY

PART I Introduction

The **Data Controller** by publishing this Policy, takes measures to comply with the following legislation with the aim of providing all relevant information and notifications to natural persons involved in the processing of personal data (partners of the Data Controller, hereinafter: Data Subjects) in a concise, transparent, comprehensible and easily accessible form, clearly and comprehensibly worded, as well as to help those concerned in exercising their rights contained in this Policy.

The Data Controller considers the protection of the personal data of the Data Subjects and the respect of the data self-determination rights of the Data Subjects to be of utmost importance. The Data Controller treats personal data confidentially and takes all security, technical and organizational measures that guarantee the security of the data.

The processing of personal data is based on the following legislation:

- **Act CXII of 2011** on the right to self-determination of information and freedom of information (hereinafter: Info Law);
- the **Regulation (EU) 2016/679 of the European Parliament and of the Council** (hereinafter: **GDPR**) on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, as well as on the repeal of Regulation 95/46/EC (general data protection regulation);

PART II General Information

1. The Data Controller:

HUN-REN Rényi Alfréd Matematikai Kutatóintézet (official seat: 1053 Budapest, Reáltanoda utca 13-15.; hereinafter referred to as Data Controller), as **Data Controller** agrees to be bound by the content of this legal notice. In the course of all data processing related to its activities, it strives to ensure that data management complies with the expectations set out in this prospectus and the applicable legislation.

The Data Processor:

The Data Controller may make use of the Data Processor during the data processing activities set out in this Policy.

If there is a change in the person of the Data Processor(s), the Data Controller – about the modification of the Policy – will notify the Data Subjects about this.

There is currently no contractual relationship with the Data Controller.

2. Publication

- This data protection information of the Data Controller is continuously available at the <https://renyi.hu/hu> address (hereinafter: website or website).

3. Amendment and scope of this Policy

The Data Controller reserves the right to change this Policy unilaterally, without a time limit, and will notify those affected by the Data Controller of any changes in a timely manner on the website. Amendments to the Privacy Policy may become necessary primarily for the sake of compliance with legislation.

The content of the Data Controller's website is protected by copyright, so any visual or textual element thereof may only be used with the prior written permission of the owner. The Data Controller shall not be liable for any damages resulting from visiting the website.

This Policy is valid until revocation, its scope covers persons providing personal data on the website, their contractual partners, the officers, employees, data protection officer of the Data Controller (if any); and all data subjects whose personal data are processed by the Data Controller.

The Data Controller will ensure that this Policy is reviewed and updated as necessary. If the Data Controller intends to carry out further data processing of the personal data for a purpose other than the purpose of their collection, they shall inform the Data Subject of this and obtain their prior, express consent, or provide them with the opportunity to prohibit the use of collected data.

4. Definitions

- data subject: any natural person identified or - directly or indirectly - identifiable on the basis of any specific personal data
- personal data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- sensitive information:
 - a) personal data revealing racial origin, nationality, political opinions or party affiliation, religious or philosophical beliefs, membership of representative associations, sex life,
 - b) personal data concerning health, pathological addiction and criminal personal data;
- the data subject's consent: shall mean any freely and expressly given specific and informed indication of the will of the data subject by which he signifies his agreement to personal data relating to him being processed fully or to the extent of specific operations.
- controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- processing: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- data processing: performing technical tasks related to data management operations, regardless of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data;;
- processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- personal data breach: a breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorized transmission or disclosure of, or access to, personal data transmitted, stored or otherwise processed

During the activities related to data processing, as well as in this Policy, the Data Controller themselves use the terms found in the Info Law and the GDPR.

PART III Processing of personal data

Data processing carried out by the Data Controller in relation to browsers on the <https://renyi.hu/hu> website

A. COOKIE management

As natural persons can be associated with online identifiers, such as IP addresses and cookie IDs, provided by the devices, applications, tools and protocols they use, such data, combined with other information, can be used to profile and identify a natural person.

The website operated by the Data Controller uses cookies to enhance the user experience. The visitor receives an anonymous session ID, which records the start and end time of the visit and the pages visited for statistical purposes. All new visitors are informed about this practice on their first page view. The purpose for which cookies are used is statistical.

The Data Controller's servers automatically register (log) the IP address of the Users, the type of operating system and browser used, the URL of the visited pages and the time of visit at each access level of the website. These data are processed by the Data Controller only in aggregated, anonymised and processed form in order to correct any errors on the website, improve their quality and for statistical purposes. Cookies storing user-recorded data, authentication session cookies, user-centered cookies, multimedia playback session cookies, load balancing session cookies and session cookies that help customize the user interface must be notified to the data subject in advance, but the consent of the data subject is not required.

B. Data processing related to sending newsletters

Through the website operated by the Data Controller, it is possible to send invitations and newsletters about current conferences / events to persons already registered for events.

Personal data processed	Legal title (legal basis)	Target	Duration of data processing
Name	Consent of the data subject	Get information about the latest conferences and events.	until you request to unsubscribe from the newsletter service
E-mail address	Consent of the data subject	Get information about the latest conferences and events.	until you request to unsubscribe from the newsletter service

When registering for events, the data subjects who subscribe accept the contents of this Privacy Policy at the start of registration. Subsequently, the data subject will receive a confirmation e-mail to the e-mail address provided by him, clicking on which will activate the registration. If confirmation is not made within 24 hours, the registration process must be restarted.

The Data Controller shall communicate the unsubscription from the newsletter service to the data subjects in an easily accessible and clear manner. Unsubscribing may be made by sending a request to the address of the Data Controller indicated in this prospectus (math@renyi.hu, 1053 Reálanoda utca 13-15.).

For data processing for the purpose described in this subsection, the provision of the indicated personal data is mandatory. The consequence of the failure to provide data is that the service cannot be used by the data subject.

The Data Controller is responsible for the data processing implemented in this subsection.

C. Event Management

1. Event registration

The Data Controller organizes events several times a year in connection with events affecting its own field of activity. The public event is open to stakeholders who have registered in advance.

Personal data processed	Legal title (legal basis)	Target	Duration of data processing
Name, email address, health data (at events where dinner is served)	Consent of the data subject	Checking eligibility for participation in the event, preliminary calculation of the number of participants, preparation to meet the needs	After the end of the respective event, the personal data provided will be deleted.
Field of expertise (organization) from which the data subject comes	Consent of the data subject	The Data Controller assesses which fields of expertise are attracted by the event organized by it, and may later organize events specializing in these fields.	After the end of the respective event, the personal data provided will be recorded in aggregated, anonymised and processed form for statistical purposes. Subsequently, individuals cannot be applied to those involved in the event.

For data processing for the purpose described in this subsection, the provision of the indicated personal data is mandatory. The consequence of the failure to provide data is that the service cannot be used by the data subject. The Data Controller is responsible for the data processing implemented in this subsection.

2. Taking photos at an event

During the events organized by it, the Data Controller may make video recordings of the performers, the venue and the data subjects present, which are published on its website. By participating in the event, the data subjects give their consent pursuant to Section 2:48 (1) of Act V of 2013 on the Civil Code for the Data Controller to take photographs of them and publish them on its website. In case of publication outside the Data Controller's website, the explicit consent of the data subjects is required, which the Data Controller obtains prior to publication.

Personal data processed	Legal title (legal basis)	Target	Duration of data processing
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Image of the data subject	Consent of the data subject	Publication of events at the event by publication on the website.	The photo material will be public to the visitors of the website until withdrawn after the event. Prior to this, the Data Controller shall, upon request by the data subject, make it impossible to recognize the data subject on the objected image recordings by using pixelation technology or delete the objected image from its website.
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For data processing for the purpose described in this subsection, the provision of the indicated personal data is mandatory. The consequence of the failure to provide data is that the service cannot be used by the data subject. The Data Controller is responsible for the data processing implemented in this subsection.

3. Video recording and online streaming

During the events organized by it, in the main hall of the Institute, the Data Controller uses technical solutions that simultaneously record images and sounds of the events occurring there, during which video recordings are made of the event. The video recording will be published on the Data Controller's website.

The video recording will also be broadcast live on the www.video.renyi.hu site operated by the Data Controller.

By participating in the event, pursuant to Section 2:48 (1) of Act V of 2013 on the Civil Code, the data subjects give their consent for the Data Controller to make a recording of images and sounds simultaneously at its events, to broadcast it live on its website, and then to publish it on its website in whole or even in parts, edited.

Personal data processed	Legal title (legal basis)	Target	Duration of data processing
Video image and sound recording	Consent of the data subject	Publication on the website, production of short videos for the purpose of informing the public afterwards.	The video recording, all its versions, will be public to the visitors of the website for 10 years after the event. Prior to this, upon request by the data subject, the Data Controller shall make the recognition of the data subject impossible in the challenged video parts by distortion and/or pixelation, or modify (trim) the challenged video in such a way that the video and audio recordings relating to the data

			subject cannot be accessed.
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For data processing for the purpose described in this subsection, the provision of the indicated personal data is mandatory. The consequence of the failure to provide data is that the service cannot be used by the data subject. The Data Controller is responsible for the data processing implemented in this subsection.

D. Requests for information of public interest

In compliance with its legal obligation, the Data Controller records requests for access to data of public interest managed by it, regardless of the method of submission (written, oral, electronically). By sending the request, the data subject sending the request for access to data of public interest acknowledges that his or her personal data will be recorded.

Personal data processed	Legal title (legal basis)	Target	Duration of data processing
Name, notification address (postal address, e-mail address)	Act CXII of 2011, Section 28 (2).	Compliance with public interest data requests carrying out an examination based on the criterion specified in Section 29 (1a) of the Info Act payment of the reimbursement of expenses established for the fulfilment of the claim	5 years

For data processing for the purpose described in this subsection, the provision of the indicated personal data is mandatory. The consequence of the failure to provide data is that the service cannot be used by the data subject. The Data Controller is responsible for the data processing implemented in this subsection.

In the case of an incapacitated minor under the age of 14, only the legal representative of the data subject may provide personal data on behalf of the data subject. The provision of the personal data of an incapacitated data subject requires the declaration of the legal representative. The signed declaration must be sent to the Data Controller by personal delivery, post, e-mail or fax, or the statement may be made in another verifiable way (e.g. video and/or audio recording).

The processing of personal data of minors under the age of 16 who have limited legal capacity requires the consent of the minor's legal representative.

The consent or subsequent approval of his/her legal representative is not required for the validity of his/her legal statement containing his/her consent to data processing (i.e. registration or other provision of his/her personal data). Depending on the method of data collection, such data subject may give his or her consent to data processing.

Consent of the person concerned, conditions

Processing based on consent should only take place if the data subject gives his or her freely given, specific, informed and unambiguous consent to the processing by means of a clear affirmative act, such as a written statement, including by electronic means, or an oral statement. It also constitutes

consent to data processing if the data subject ticks a relevant box when visiting the website. Silence, pre-ticked boxes or inaction do not constitute consent. Consent also applies if a user makes technical settings or makes a statement or action that clearly indicates the consent of the person concerned to the processing of his or her personal data in the given context.

Where processing is based on consent, the controller should be able to demonstrate that the data subject has given consent to the processing of his or her personal data. Where the data subject's consent is given in a written declaration which also relates to other matters, the request for consent shall be communicated in a manner clearly distinguishable from those other matters. The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Before consent is given, the data subject shall be informed thereof. It should be possible to withdraw consent in the same simple way as to give it. In determining whether consent is voluntary, utmost account should be taken of the fact, inter alia, whether the performance of the contract, including the provision of services, is conditional upon consent to the processing of personal data which are not necessary for the performance of the contract.

The processing of personal data in relation to the offer of information society services directly to a child should be lawful if the child is at least 16 years old. In the case of a child under the age of 16, the processing of personal data of children is lawful only if and to the extent that consent has been given or authorised by the holder of parental responsibility over the child. The processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health and personal data concerning a natural person's sex life or sexual orientation shall be prohibited, unless the data subject has given his or her explicit consent to the processing of those personal data for one or more specific purposes.

The consent of the person concerned must clearly indicate that the data subject consents to data processing. Where processing is based on the data subject's consent, in case of doubt, it shall be for the controller to prove that the data subject has consented to the processing operation.

PART IV OTHER DATA PROCESSING QUESTIONS

1. Right to revoke consent:

Data processing based on consent can only take place if the individual concerned gives their voluntary, specific, informed and clear consent to the processing of data by means of clear affirmative action, for example a written – including electronic means – or oral statement. Keeping silent, a pre-ticked box or inaction does not constitute consent. It is also considered consent if a Data Subject makes a statement or action that clearly indicates the consent of the person concerned to the processing of their personal data in the given context.

If the data processing is based on consent, the Data Controller must be able to prove that the Data Subject has consented to the processing of their personal data. If the Data Subject gives their consent in the context of a written statement that also applies to other matters, the request for consent must be communicated in a way that is clearly distinguishable from these other matters. The Data Subject has the right to revoke their consent at any time. Revoking their consent does not affect the legality of data processing based on consent prior to revocation. Before giving consent, the Data Subject must be informed of this. The possibility of revoking the consent must be made possible, just as easy as providing said consent.

Conditions for the child's consent in relation to services related to the information society:

If point a) paragraph (1) of Article 6 of the GDPR is the legal basis for data processing, the processing of personal data in relation to information society-related services offered directly to

children is only legal if the child has reached the age of 16. In the case of a child under the age of 16, the processing of the children's personal data is legal only if and to the extent that consent was given or authorized by the person exercising parental supervision over said child.

The Data Controller - taking into account the available technologies - must make a reasonable effort to verify in such cases that the consent was given or authorized by the person exercising parental supervision over said child.

The Data Controller notifies those concerned that they do not provide services related to the information society offered directly to children.

Personal Data is voluntarily made available to the Data Controller by the Data Subject, which is why when providing the data, extreme care must be taken to ensure their veracity, correctness and accuracy because the Data Subject is responsible for them. Incorrect, inaccurate or incomplete data can be an obstacle to using the Data Controller's services.

In order to fulfill a legal obligation or assert a legitimate interest, the Data Controller may process certain data even after the withdrawal of consent and notify the Data Subject of this upon withdrawal of consent.

2. The following persons have the right to access the data:

The Data Controller, as well as their Employees, as well as the participating people who have a legal relationship with the Data Controller for the purpose of providing services, are only entitled to access personal data in connection with the performance of their tasks, for the purpose of the effective performance of the activity and only to the extent necessary for this.

In the case of handling special data,¹ the Data Controller or the data processor acting on their behalf or at their direction shall ensure with appropriate technical and organizational measures that, during the performance of the data processing operations, access to the special data shall be granted only to those whose duties are absolutely necessary for the performance of the tasks related to the data processing operation.

The court, the prosecutor's office and other authorities (e.g. police, tax office, National Data Protection and Freedom of Information Authority) may contact the Data Controller for the purpose of providing information, communicating data or making documents available. In these cases, the obligation to provide data must be fulfilled, but only to the extent absolutely necessary to achieve the purpose of these requests.

3. Transfer of data: The Data Subject's data are only transferred within the framework defined by law, and in the case of data processors, the Data Controller ensures by stipulating contractual conditions that they cannot use the Data Subject's personal data for purposes contrary to the Data Subject's consent.

The Data Controller does not transfer data abroad.

4. Data security

By applying technical and organizational measures appropriate to the degree of risk, the Data Controller ensures the security of the data of the Data Subjects, protection against unauthorized or illegal processing of data, accidental loss, destruction or damage, including ensuring the confidentiality, integrity, availability and resilience of the IT systems and tools used to manage the personal data. To this end, the Data Controller uses IT tools, especially firewalls, encryption, and physical protection devices in their systems, and also provides physical protection to all locations where the data is accessible. When determining and applying measures for data security, the Data Controller must take into account the state of the technical development at all times. From among several possible data processing solutions, they must try to choose the one that ensures a higher

¹ All data belonging to special categories of personal data, i.e. personal data referring to racial or ethnic origin, political opinion, religious or worldview beliefs or trade union membership, as well as genetic data, biometric data for the unique identification of natural persons, health data and personal data relating to the sex life or sexual orientation of natural persons.

level of protection of personal data, unless its implementation would represent a disproportionate difficulty for the Data Controller.

The Data Controller ensures that no one other than the Data Controller's Employees can enter the location of the personal data stored on paper medium and that the area where it is stored is closed to other patients and visitors.

Those in a legal relationship with the Data Controller are only entitled to enter the computer system based on their own, unique code, and are only entitled and able to access the personal data of those concerned with whom they came into direct contact.

In the event of a breakdown or malfunction, the resources are available, with the help of which the elimination of the breakdown or malfunction can be carried out quickly, efficiently and in an expected manner, compared to the extent of the breakdown or malfunction.

PART V

Rights of the Data Subjects, legal remedies

The Data Subject may exercise the rights granted to them in this Policy and in the legislation at any of the contact details of the Data Controller indicated in this Policy (Part II).

Rights of the Data Subject:

1. Right to Request Information (Right of Access)

You are entitled to receive feedback from the Data Controller as to whether your personal data is being processed, and in the case, that it is being processed, you are entitled to:

- get access to the processed personal data and
- the following information shall be provided by the Data Controller:
 - the purposes of data processing;
 - categories of personal data processed about You;
 - information about the recipients or categories of recipients to whom the personal data has been or will be disclosed by the Data Controller;
 - the planned period of storage of personal data or, if this is not possible, the criteria for determining this period;
 - Your right to request from the Data Controller the correction, deletion or restriction of processing of your personal data and, in the case of data processing based on legitimate interests, to object to the processing of such personal data;
 - the right to submit a complaint to the supervisory authority;
 - if the data was not collected from You, any available information about its source;
 - about the fact of automated decision-making (if such a procedure is used), including profiling, as well as, at least in these cases, comprehensible information about the logic used and the significance of such data management and the expected consequences for You.

The purpose of exercising the right may be aimed at establishing and checking the legality of data processing, therefore, in case of multiple requests for information, the Data Controller may charge a fair fee in exchange for providing the information.

Access to personal data is ensured by the Data Controller by sending the processed personal data and information to You by email after your identification. If You have a registered account, the access is provided by us in such way that you can view and check your personal data by logging into your user account.

Please indicate in your request whether You are requesting access to personal data or information related to data processing.

Upon your request, information must be sent to the provided contact information immediately, but no later than 30 days.

2. Right to Rectification

Any interested party can request the modification or supplementation of any of their data. Upon your request, action must be taken immediately, but no later than within 30 days, and a notification must be sent to the contact address provided.

3. Right to Deletion (Right to be Forgotten)

Any interested party may request the deletion of their data if: a) your personal data are no longer needed for the purpose for which they were processed by the Data Controller; b) the Data Subject withdraws the consent that forms the basis of the data processing, and there is no other legal basis for the data processing; c) the Data Subject objects to data processing and there is no other legitimate reason for data processing, d) your personal data was processed illegally by the Data Controller; e) your personal data must be deleted to fulfill the legal obligation applicable to the Data Controller; f) personal data was collected in connection with the offering of services related to information society to children.

Upon your request, this must be done immediately, but no later than within 30 days, and notification must be sent to the contact address provided.

4. The Right to Block and Restrict

You have the right to have the Data Controller restrict data processing at your request if one of the following is true:

- You dispute the accuracy of the personal data, in which case the restriction applies to the period that allows the Data Controller to check the accuracy of the personal data, and if the exactness of the data can be determined immediately, the restriction will not apply;
- the data processing is unlawful, but You oppose the deletion of the data for any reason (for example, because the data are important to you for asserting a legal claim), therefore You do not request the deletion of the data, but instead request the restriction of their use;
- the Data Controller no longer requires the personal data for the purpose of the indicated data processing, but You require them to submit, enforce or defend legal claims; or
- You objected to the data processing, but the Data Controller's legitimate interest may also justify the data processing, in this case, until it is established whether the Data Controller's legitimate reasons take precedence over your legitimate reasons, data processing must be restricted.

If the data processing is subject to restrictions, such personal data may only be processed with the consent of the Data Subject, with the exception of storage, to submit, enforce or defend legal claims, or to protect the rights of another natural or legal person, or in the important public interest of the Union or a member state.

The Data Controller will notify You in advance (at least 3 working days before the restriction is lifted) of the lifting of the restriction on data processing.

The blocking lasts as long as the specified reason makes it necessary to store the data. Upon request, this must be done immediately, but no later than within 30 days, and notification must be sent to the contact address provided.

5. Right to Protest

Any person can object to data processing based on legitimate interest via the contact details provided. In this case, the Data Controller may no longer process the personal data, unless the Data Controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the Data Subject, or that are related to the submission, enforcement or defense of legal claims. The protest must be examined as soon as possible, but no later than 15 days after the submission, and a decision must be made regarding its validity and notification about the decision must be sent to the contact address provided.

6. Right to Data Portability:

The Data Subject may request the Data Controller to receive the personal data concerning them, provided by the Data Subject to the Data Controller, in a segmented, widely used, machine-readable format, furthermore, they are entitled to transfer these data to another Data Controller, if the data processing is based on the Data Subject's consent or a contract and the data processing takes place in an automated manner. When exercising the Right to Data Portability, the Data Subject is entitled to - if this is technically feasible - request the direct transfer of personal data between Data Controllers.

The Data Controller shall fulfill the Data Subject's request within a maximum of 30 days and notifies the Data Subject of this in a letter sent to the contact address provided by the Data Subject.

7. Automated Decision Making

You have the right not to be subject to the scope of a decision based solely on automated data processing (including profiling) that would have legal effects on You or would likewise significantly affect you. In these cases, the Data Controller is obliged to take appropriate measures to protect the rights, freedoms and legitimate interests of the Data Subject, including at least the right of the Data Subject to request human intervention on the part of the Data Controller, to express their point of view and to submit objections to the decision.

The above does not apply if the decision:

- It is necessary to conclude or fulfill the contract between You and the Data Controller;
- it is made possible by EU or member state law applicable to the Data Controller, which also establishes appropriate measures for the protection of your rights and freedoms, as well as your legitimate interests; or

is based on Your explicit consent.

PART VI

Legal enforcement options related to data processing

1. The Data Subject may contact the Data Controller with a complaint about data processing at any of the contact details indicated in Part II of this Policy. In case the Data Subject does not consider the Data Controller's procedure acceptable, they may contact the National Data Protection and Freedom of Information Authority (Address: 1125 Budapest, Szilágyi Erzsébet alley 22/c.; Telephone: +36-1-391-1400; E-mail: ugyfelszolgalat@naih.hu; Website: www.naih.hu) directly.

As an official, the Managing Director oversees the data processing of the Data Controller with full authority and is entitled to take all necessary measures to promote data protection.

2. In the event of unlawful data processing, the Data Subject may initiate a civil lawsuit against the Data Controller. Adjudication of the lawsuit falls within the jurisdiction of the court. Based on the choice of the person concerned, the lawsuit can also be initiated before the court of their place of residence (you can view the list and contact details of the courts via the following link: <http://birosag.hu/torvenyszekek>).

The court shall handle such cases with priority

3. The Data Controller notifies the Data Subject without undue delay, but at the latest within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this deadline can be extended by another two months. The obligation to provide information can be ensured by operating a secure online system through which the Data Subject can easily and quickly access the necessary information.