

Data Protection Policy

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Through this Data Protection Policy, the Hungarian Helsinki Committee seeks to inform its data subjects about the practice of data processing in relation to activity support of the data processor, data processing related to website visiting, the practice of organizational and technical measures taken for the purpose of data protection, and about the rights and law enforcement possibilities of the data subjects.

1. The data processor

The data processor is the Hungarian Helsinki Committee (Budapest, Bajcsy-Zsilinszky út 36-38., tel./fax: (36 1) 321 4323, 321 4327, 321 4141, email: helsinki@helsinki.hu, data protection registration number: NAIH-91930/2015.)

2. Data processing and its purposes

2.1. The purpose of the data processor in relation to its activity support, is the bookkeeping of the donations (hereinafter: data processing related to donation bookkeeping).

2.2. The further aim of data processing is to later inform the donors, and the supporters of the data processor, about the donations' utilization, to inform about its own, public purposed activities, and to send requests regarding the possibilities of future support (hereinafter: data processing related to donor communication).

2.3. Lastly, the aim of data processing is to provide accessibility to the data processor's website, to maintain the system's operability (data protection is indispensable to a website operation) and to create website traffic statistics (hereinafter: data processing related to website usage)

The data processor does not control any personal data, which has a different aim.

3. The data controlled

3.1. During data processing related to donation bookkeeping, the data processor – depending on the chosen code of the donation, or of the support – manages and can respectively control the data subject's name, address, e-mail address, phone number, the amount of the donation, the date of the donation and the data subject's bank account.

3.2. During data processing related to donor communication, the data processor, (apart from the data included in section 3.1.), can control all the information related to the data subject's declaration whether, during donor communication, he/she wishes to receive any further information or invitation.

3.3. During data processing related to website usage, the following additional information is recorded: the starting and finishing point of the data subject's visit, the data subject's IP address, and the type of the internet browser and of the operating system.

4. The legal basis of data processing

The data processor controls all the personal data, but only with the data subject's voluntary, determined and informed consent (the exception being when the law permits or it is required as a mandatory step.

4.1. During the data processing related to donation bookkeeping, the data subject, by providing the payment, consents to the fact that all of the donation related data are to be controlled by the data processor. According to accountaning law, Law C of 2000, article 169, paragraph (2), all, which are directly and indirectly included in the bookkeeping material, must be preserved.

4.2. In addition, the data subject can freely make a choice with respect to the disclosure of his/her data (accessibility data) in relation to donor communication, and whether he/she agrees that this data can be used for the purposes of donor communication. The data processor obtains this statement from the data subject's implied conduct (donation, support, providing further data).

4.3. Data processing related to website usage fundamentally depends on the data subject's decision. More information on the legal basis of the electronic commercial service and the services related to the informational society can be found in Law CVVIII from 2011 article 13/A paragraph (3) (technically indispensable data for service providing).

5. The length of data processing

5.1. In the case of data processing related to donation bookkeeping, the data is preserved by the data processor, from the point of their formation, for eight years.

5.2. In the case of data processing in relation to donor communication, the data processor continues its work provided the data subject does not makes a declaration that he/she does not wish to be part of the data processing in relation to donor communication anymore, or does not wish to receive any further information, or does not expressly demands the deletion of his/her data.

5.3. Data processing in relation to website usage, at most lasts until the visiting statistics are prepared, which happens periodically, every five years.

6. Access to data, data processors

Personal information is not forwarded to third persons. This does not refer to those data that is included in the laws, which requires mandatory data disclosure. In every case of data requests by the authorities, the data processor will analyze whether the legal foundation of data forwarding is present.

6.1. During data processing related to donation bookkeeping, the data is accessed by the data processor's coworkers, as well as by the tax office or the courts, in case of an inspection. The data processor does everything in its power, to prevent officials from using their monitoring powers to personally identify the donors.

6.2. During data processing related to donor communication, the data is accessed by the data processor's coworkers, by the data processors who are working on the website's development and support, and by the data processors involved in the IT system's maintenance (Innowatio Betéti Társaság, address: Detrekő utca 12., company registration number: 01-06-787643, tax number: 24854982-1-42, Datalytics Solutions Kft., address: Detrekő utca 12., company registration number: 01-09-270527, tax number: 25358159-2-42, Dialóg Interaktív Kft., address: 2120 Dunakeszi, Konrád Ignác u 20. A. lház. 3., company registration number: 13-09-121654, tax number: 13458465-2-13 and name: Tóth Bernadett e.v., location address: 1192 Bp., Határ út 16., tax number: 65839759-2-43).

6.3. During data processing related to website usage, the data is accessed by the data processor's coworkers, by the data processors who are working on the website's development and support and by the data processors involved in the IT system's maintenance (Innowatio Betéti Társaság, address: Detrekő utca 12., company registration number: 01-06-787643, tax number: 24854982-1-42, Datalytics Solutions Kft., address: Detrekő utca 12., company registration number: 01-09-270527, tax number: 25358159-2-42, Dialóg Interaktív Kft., address: 2120 Dunakeszi, Konrád Ignác u 20. A. lház. 3., company registration number: 13-09-121654, tax number: 13458465-2-13 and name: Tóth Bernadett e.v., location address: 1192 Bp., Határ út 16., tax number: 65839759-2-43).

7. The rights of the data subjects

All data subjects have the right to request information about their controlled personal data. When requested, the data processor will inform the data subjects of the data controlled either by the data

processor, or of the data controlled with a mandate by another data processor in writing and within 30 days This will include the data's source, the purpose of data processing, its legal basis, its length, the name of the data processor, its address, its activities in relation to data processing, the circumstances of the data protection incident, its effects and the action taken to avert it. Moreover – in case of personal data forwarding – information will be given about its legal basis and its addressee. The information can be requested at the address or at the e-mail address of the data processor so long as proper identification has been provided to verify the data subject's identity.

Data subjects can request the deletion or the correction of their personal data, or they can protest against data processing by contacting the data processor. The data processor will immediately comply with these requests, unless when there is a law prescribes data preservation as a mandatory act. At any point, data subjects can forbid the use the use of their data related to donor communication by contacting the data processor. In this case, the data processor puts these data on a so called prohibitive list.

8. The possibilities for law enforcement

If the data subject believes that the data processor has violated his/her right to personal information, then the data subject should immediately contact the data processor in order to find an effective remedy to the potential privacy violation. If this does not lead to a solution, then the affected persons can notify the Hungarian National Authority for Data Protection and Freedom of Information (details can be found here: <http://naih.hu/panaszuegyintezes-rendje.html>), or he or she can file a complaint with the Metropolitan Court (Fővárosi Törvényszék) or to the local court, with the proper jurisdiction, (based on the address of the data subject). For further details, please see the law regarding freedom of information: Law CXII from 2001, article 22.

9. Disclaimer

The data processor reserve the right to alter this data protection policy. This is likely to happen in instances where the scope of the services broadens, if the contact information and the place of the data processing changes or if a legislation requires such. The change of data processing cannot mean that the purposes change too. Information regarding this issue, will be published on the website 15 days before the change occurs.

Last date of change: 01.08.2016.