

# Data Protection Policy

Created: 17.09.2021

## THE SCOPE OF THIS POLICY

**SIMPACT** Nonprofit Ltd. (hereinafter as “Data Controller”) is dedicated in the protection of the data of its clients, partners, volunteers and employees. Therefore **we treat personal information confidentiality**. We take all security, technical and organizational measures that guarantee the safety of your data, and we also review these measures from time to time.

**The purpose of this Policy is to describe our data management principles**, presenting expectations we have raised and complied with, as data controllers.

## APPLICABLE LAWS

Our Privacy Policy is in line with the following data protection legislations:

- Act CXII of 2011 on information self-determination and freedom of information
- Regulation (EU) 2016/679 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)

We reserve the right to amend this privacy policy in which case we shall share it on the Website. If we make any significant changes to this policy and it is reasonably possible for us to do so, we will contact you directly with more information.

## PRINCIPLES RELATING TO PROCESSING OF DATA

<b>LAWFULNESS, FAIRNESS AND TRANSPARENCY</b>	During the data processing we act fairly, legally and in accordance with the purpose of the processing.
<b>PURPOSE LIMITATION</b>	We collect and process data only for specific, clear and legitimate purposes.
<b>DATA MINIMISATION</b>	The data we process is relevant and limited to the necessary, according to the purposes of data processing.
<b>ACCURACY</b>	In the course of data processing, we endeavour to ensure that the processed data is kept up to date, accurate and complete.
<b>STORAGE LIMITATION</b>	We process personal data only to the extent and duration required to achieve the aim of the processing, and we ensure that after this duration the identification of the data subject is not possible.
<b>INTEGRITY AND CONFIDENTIALITY</b>	We provide technical and organizational measures to protect the security of data processing. These measures provide a level of protection that meets the risks associated with the data processing.

## WHAT TYPE OF PERSONAL DATA DO WE PROCESS?

**Personal data** is any kind of data that can be associated with the data subject, in particular the name, identification data and information on physical, physiological, mental, economic, cultural or social identity of the data subject, as well as the conclusion that can be deduced from this data.

We only process personal data with the **data subjects' consent** of processing his/her data (consensual lawful basis). In certain cases, the processing, storage and transfer of the data is made mandatory by law. (Legal obligation)

Az adatkezelő személyes adatokat kizárólag akkor kezel, ha ahhoz **az érintett önkéntes hozzájárulását adta** (hozzájáruláson alapuló jogalap), **hogy az adott célra az adatát felhasználjuk. Bizonyos esetekben** azonban a megadott adatok egy körének kezelését, tárolását, továbbítását **jogszabályok teszik kötelezővé** (jogi kötelezettségen alapuló).

SIMPACT Nonprofit Ltd. only processes data and to the extent that is essential for the efficient and effective operation of the business. The list of the data processed:

### IN OUR DATABASES

Aim of the data processing	Type of personal data	Lawfulness
<ul style="list-style-type: none"><li>• Data necessary for contacting and informing</li></ul>	name, phone number, email address	Consensual basis
<ul style="list-style-type: none"><li>• Data required to maintain/ develop business relations:</li></ul>	name, phone number, email address, employer, position	Consensual basis
<ul style="list-style-type: none"><li>• Data required for developing / maintaining joint work</li></ul>	CV (includes the name, phone number, place and date of birth, email address), motivation letter	Consensual basis / Contractual basis
<ul style="list-style-type: none"><li>• Data required for HR administration tasks</li></ul>	Job contracts of employees, trainees, wage details, etc.	Contractual basis
<ul style="list-style-type: none"><li>• Data required to collect, store and report, obligated by Adult Education Act</li></ul>	personal data based on LXVII. Act about the Adult Education, 2013	Legal basis
<ul style="list-style-type: none"><li>• Data required to perform accounting tasks, NAV compliance</li></ul>	Bills, income certificates, etc.	Contractual basis

### WEBSITE

A [www.simpact.hu](http://www.simpact.hu) weboldal üzemeltetője:

Cég: RACKFOREST KFT.

Székhely: 1132 Budapest, Victor Hugo u. 18-22.

Elektronikus levélcím: [info@rackforest.com](mailto:info@rackforest.com)

We use cookies on our Website in order to make the Website work more efficiently as well as provide information on the use of the site. The cookies collect information in an anonymous form, including the number of visitors, where visitors have come to the Website from and the pages they visited.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The information below explains the cookies we use and why.

These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.

To find information relating to how to manage cookies on popular browsers, please visit the browser developer's website. To opt out of being tracked by Google Analytics across all websites, visit <http://www.google.com/privacy.html> and <https://www.facebook.com/about/privacy/>.

#### NEWSLETTER SUBSCRIPTION

When you sign up for our newsletters from us by completing the newsletter sign up form, we collect your name, email address and organisation. We will also record the time and date of completion. You give your consent to us sending our newsletters.

Aim of data processing	Type of personal data	Lawfulness
Quarterly newsletter	Name, email address, organization	Consensual basis

**Consent withdrawal** can be made via the link in the newsletter or the [info@simpact.hu](mailto:info@simpact.hu) email address. **A megadott személyes adatok valódiságáért a felhasználó felel.**

Our newsletters are delivered to you with **MailChimp**. The platform is dedicated to protecting personal information, and handles data protection with utmost importance. It never transfers data, lists containing personal info or email addresses to third parties. You can read the detailed privacy policy [here](#).

#### OTHER DATA PROCESSES

Information on data processes that are not included in this Policy is provided upon the processing of data.

#### DATA SECURITY

Personal data is processed with **the utmost care, strict confidentiality**, only to the extent necessary to provide service, in accordance with the data subjects' consent and provisions.

We take care of the protection of personal data and minimize risks related to data processing by **IT and organizational measures**. We regularly review these measures and if necessary we modify them. This way we ensure that the processed data is:

- protected against unauthorized access (confidentiality)
- accessible to authorized persons (availability)
- certifiably authentic and authenticable (credibility of data management)
- Verifiably unalterable (integrity).

## DATA PROCESSOR

SIMPACT Nonprofit Ltd. does not use data processors to manage the personal data.

## RIGHTS OF THE DATA SUBJECTS

You can exercise your rights to SIMPACT Nonprofit Ltd. by sending letter to the **2120 Dunakeszi, Mária street 2.** postal address, or via email to the [info@simpact.hu](mailto:info@simpact.hu) email address.

**INFORMATION** Everyone is **entitled to request information on their data processed by us**, in particular the source of the data, the aim, lawfulness and duration of data processing, the name and address of the data processor, any data protection incidents and the measures taken to overcome it, - in the case of transferring the personal data – the lawfulness and recipient of the transfer. Information can be requested on the contact address of the **Data Processor**.

The information will be provided as soon as possible, within 25 days. The disclosure to information is denied only in cases defined by law.

**ACCESS** The data subject **has the right to view his/ her personal information at any time, if the request is provided in advance** in one of the contact information of the Data subject.

**RECTIFICATION** If the personal data is not completely correct, **correction can be requested** in the contact details of the Data processor. If the correct personal data is available, our data will also be corrected without any delay.

**OBJECTION** The data subject **can object to the processing of his / her personal data**, and can request the termination of data processing and erasure of personal data by sending a written request to SIMPACT Nonprofit Ltd. or by sending an email to the [info@simpact.hu](mailto:info@simpact.hu) address.

**ERASURE** Personal data **must be erased**, if

- its processing is against the law
- the person concerned asks for the erasure of his/ her personal data, except for the cases of mandatory processing;
- the data is incomplete or incorrect, and this condition cannot be legally remedied, provided that the erasure is not excluded by law;
- the aim of data processing has ceased, or the deadline for storing personal data has expired, unless the data storage has to be kept in archives;
- the erasure was ordered by court or the authority

The data subject can request the erasure of personal data by sending a written request to SIMPACT Nonprofit Ltd. or by sending an email to the [info@simpact.hu](mailto:info@simpact.hu) address.

In this case the data will be permanently deleted without undue delay.

### **CONTACT OF THE DATA CONTROLLER**

Company name: SIMPACT Nonprofit Ltd.

Registered office and postal address: 2120 Dunakeszi, Mária street 2.

Phone: + 36 30 382 8846

Email address: [info@simpact.hu](mailto:info@simpact.hu)

Tax number: 25830024-1-13

Company registry number: 13-09-184483

Web page: [www.simpact.hu](http://www.simpact.hu)

Facebook: [www.facebook.com/simpacteurope](http://www.facebook.com/simpacteurope)

### **JUDICIAL REMEDY**

Complaints regarding the violating of the law in the data processing can be filed with the National Authority for Data Protection and Freedom of Information.

Headquarters: 1024 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1534 Budapest, Pf.: 834

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)