

**Versavica Kft. and the Oriolus Program operated by it
Data Processing, Data Protection and Privacy Policy**

PREAMBLE

The General Data Protection Regulation of the European Union (Regulation 2016/679 of the European Parliament and of the Council), commonly known as GDPR, abbreviated in English; GDPR = General Data Protection Regulation, is obligatory as of 25 May 2018.

The Regulation lays down rules on the protection of natural persons with regard to the processing of their personal data and on the free movement of personal data. The Regulation protects the fundamental rights and freedoms of natural persons and especially the right for the protection of personal data. However, the free flow of personal data within the European Union should not be restricted or prohibited for reasons related to the protection of natural persons with regard to the personal data processing.

In order to adapt the data processing to the GDPR requirements, all data processing activities (databases) must first be mapped.

Budapest, 9 December, 2019

Viktória Bedő
Founder, Managing Director
Versavica Kft.
Oriolus Program

Versavica Kft. and the Oriolus Program operated by it Data Processing, Data Protection and Privacy Policy

Data controller information

Name: Versavica Kft.

Seat: 8000 Székesfehérvár, Prohászka Ottokár út 3. fszt. 4th

Company registration number: 07-09-029239

Tax number: 26498021-1-07

Founded on August 13, 2018

Mailing address: 8000 Székesfehérvár, Prohászka Ottokár út 3. fszt. 4th

E-mail address: viktorina.b@oriolusprogram.org

Represented by Viktória Bedő, Founder and Managing Director

Website: oriolusprogram.org

The purpose of the Policy:

The purpose of the policy is that **Versavica Kft. and the Oriolus Program operated by it** maintain its records in accordance with the applicable laws and EU regulations, carry out any statistical data collection, data processing and information providing activities; handle the personal data held by Versavica Kft. and the Oriolus Program operated by it. Versavica Kft. and the Oriolus Program operated by it shall exercise due care in the controlling and processing of data to prevent the occurrence of personal data breaches.

General provisions

- The provisions of the Data Processing, Data Protection and Privacy Policy (hereinafter: the Policy) are binding on **Versavica Kft. and the Oriolus Program operated by it**, all organizational units, employees and subcontractors of the Company. The acting administrative organization of **Versavica Kft. and the Oriolus Program operated by it**, as well as the acting responsible person have increased responsibility.
- The supervisory body of the Oriolus Program is Versavica Kft. who as maintainer and moderator manages the program, approves and controls the budget and its implementation and exercises the employer's rights in case of the Managing Director.
- The core activity of the organization: **The Oriolus Program offers young people from abroad the opportunity to study and travel in Europe through their programs. It does this by working with educational organizations, trainers, project manager private entrepreneurs and travel agencies to create a complex summer program for Oriolus Program participants.**

- **Versavica Kft. is engaged in mediation and organizational activities within the project.**
- Versavica Kft.'s main activity is 702205 - other project management services

Establishment of the Program Participation status: The application for the program is submitted with an online application form by the foreign student via the link sent by e-mail. The information submitted on the application form is recorded in the Oriolus Program's CRM system.

Necessary steps in order to establish a participant status:

- The participant has completely filled out the application form on the link
- The participant has uploaded the required documents in the "StudentPortal" interface created for him/her in the CRM system of Versavica Kft. and the Oriolus Program operated by it and the Oriolus Program staff informs and sends an access to the participant.

It is needed to upload the following documents: copy of passport, copy of visa, certificate of healthcare insurance, copy of airline ticket, other program-specific requirements

- The participant paid the full program fee with a transfer to the bank account of Versavica Kft. and the Oriolus Program operated by it. Information on the bank account number is receivable on the Student Portal and by e-mail at the same time.
- Participation in the program is approved by Versavica Kft. and its own operated Oriolus and its Managing Director (or an authorized person)
- The participant or the parent (guardian) of the participant exercising custody rights shall enter into an agreement with the company regarding the training and its terms.
- If the Managing Director of Versavica Kft. and its operated Oriolus Program or any other person authorized by the managing director do not accept the Participant's application the paid Program Fee will be transferred back to the Participant's account number, excluding the transaction costs, within 30 days.

The Managing Director of Versavica Kft. may decide to terminate the participation of a given student unilaterally with immediate effect. See Participant Agreement for the details.

The participant may decide to terminate the relationship unilaterally with immediate effect. See Participant Agreement for details.

One program group of the Oriolus Program contains approximately 10-20 students and several parallel programs and groups run at several locations. The logistic arrangement of programs is similar, though the substance of the educational and travel experience is different and depends on the program. Applicants indicate on the online application form which program they wish to participate in the Oriolus Program at what time and location.

- This policy compulsorily prescribes the application of the Regulation (EC) 2016/679 of the European Parliament and of the Council, on April 27, 2016., - General Data Protection Regulation of the European Union - commonly known as GDPR, abbreviated as English; GDPR = General Data Protection Regulation.
- The Regulation lays down rules on the protection of natural persons with regard to

the processing of personal data and on the free movement of personal data. The Regulation protects the fundamental rights and freedom of natural persons particularly the right to protect personal data. However, the free flow of personal data within the Union should not be restricted or prohibited for reasons related to the protection of natural persons with regard to the processing of personal data.

- Versavica Kft. and the Oriolus Program operated by it and their oriolusprogram.org website have a Privacy Notice, for users visiting the website in the Internet, which includes the procedure for the use of "cookies" by browsers. Most commonly used web browsers (Chrome, Firefox, etc.) accept and allow the download and usage of cookies by default which can be refused or disabled by modifying browser settings, as well as cookies stored on your computer can be deleted. For more information on the use of cookies, see the "Help" menu item in each browser.
- Versavica Kft. and the Oriolus Program operated by it inform the users about the cookies that require consent, if the data processing starts already by visiting the site, and asks for the consent of all users.
- Versavica Kft. and the Oriolus Program operated by it do not apply or permit cookies that make possible for third parties to collect data without the user's consent.
- Acceptance of cookies is not obligatory, however Versavica Kft. and the Oriolus Program operated by it takes no responsibility if the website may not function as expected without the permission of cookies.
- Pre-registration for the Oriolus Program and additional information may be requested by visitors to the Website using the electronic form on the Website. By filling out and submitting this form the Privacy Policy, the Privacy Notice and a request for subscription to the Oriolus Program Newsletter are agreed.
- In case of minors under the age of 16 (17 for India) the parent's/guardian's name and e-mail address is needed to be provided on the application form on which Versavica Kft. and the Oriolus Program operated by it, within 48 hours, inform the parent on the processing of their and under 16 years (in India 17 years) old children's personal data.
- Scope of data processed for online application: Applicant student's family name, first name, age, e-mail address, telephone number, country of residence; in case of a student under the age of 16, the surname, first name, e-mail address of the parent/guardian of the applicant student. (This information is used by our company solely for the purpose of registering the child and communicating with his/her parent.)

Legal basis (State of the acts in force at any given time):

- 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 data; English name: GDPR (General Data Protection Regulation);
- Constitution of Hungary;
- Act V of 2013 - on the Civil Code (Civil Code);
- CXII of 2011 Law on Information Self-Determination and Freedom of Information (hereinafter: Info tv.);
- LXIII of 1992 Law - Protection of Personal Data and Publicity of Information of

Public Interest;

- I of 2012 on the Labor Code (Mt.);
- CLV of 1997. Consumer Protection Act;
- XC of 2005 Law on Freedom of Electronic Information;
- Statutes of Versavica Kft.
- CXC of 2011. Law on National Public Education
- other legal acts, government decrees, which are related to the individual activities (they are listed in the description of the data management of the processes).

Scope of the policy:

- The prescriptions of Data Processing, Data Protection and Privacy Policy of Versavica Kft. and the Oriolus Program operated by it are mandatory for the entire Oriolus Program, all operational units, each colleagues of the administrative organization and any person who carries out personal data processing based on a contract or other relationship with Versavica Kft. and the Oriolus Program. The acting administrative organization and acting responsible person of the Versavica Kft. and the Oriolus Program operated by it have increased responsibility.
- The scope of the Policy also extends to data flows to the Data Processors used by the Data Controller.
- The material scope of the Policy extends to all personal data handled by the data management organizations and to the full range of data processing operations performed on them.

The data processing of personal data of employees at Versavica Kft. and the Oriolus Program operated by it

- Data processing concerning the employees of Versavica Kft. and the Oriolus Program operated by it does not have to be reported to the data protection register.
- The processing of Versavica Kft.'s and Oriolus Program employee's personal documents and data must be handled in accordance with Act V of 2013 on Civil Code, Info Act and Act I of 2012 on Labor Code.
- Personal document is any medium, whether in any material and shape, made by any tools, which produce at the time of the establishment of and during the employment or following the termination of employment and contains data and statements connecting to a natural person employee.
- Only employment related data can be stored about employees. The person concerned may only be required a statement or completion of data sheet which does not infringe his/her privacy.

Versavica Kft. and the Oriolus Program operated by it maintain records relating to the employment, in particular personal records, health insurance service records, private pension fund records, pay slips, social contribution records, billing materials, salary transfers, salary transfers, statistical reports, personal income records, OEP settlements, tax and social contribution returns, posting orders, private use of cars for official purposes.

- Personal documents and personal data shall be protected particularly against unauthorized

access, alteration, transfer, disclosure, deletion or destruction and against accidental destruction or damage. Identity documents and other paper records should be stored in a lockable locker room of Versavica Kft. and the Oriolus Program operated by it to prevent unauthorized access. Data protection must also be ensured in case of electronically stored data. Versavica Kft. and the Oriolus Program operated by it ensure this through their GDPR-compliant CRM system.

- Personal documents may be used by the competent administrator to the extent necessary for the job. The person who exercises employer's rights is also entitled to inspect the documents.

- Personal employment documents or papers may only be received in person or by a proxy, or by registered mail to the data subject's address with his/her acknowledgment of receipt.

- Job applications submitted by Versavica Kft. and the Oriolus Program operated by it must be accompanied by the personal consent of the applicants to the processing of their personal data together with the application materials. When the application has been evaluated the media containing the personal data of unsuccessful applicants shall be returned to the applicants upon their request within 90 days terminated in case of the lack of the applicant's consent to further use of personal data. Termination (deletion) must be recorded in minutes. Exceptions to this are job applications submitted for jobs financed with tenders or government support. In this case Versavica Kft. and the Oriolus Program operated by it must certify how the positions were filled, so applications and advertisements are needed to have for registration purposes in order to the competent ministry or other body of the Hungarian State Treasury or the State Audit Office of Hungary may verify this information in their audit procedure. (In such cases, Versavica Kft. and the Oriolus Program operated by it shall inform the applicant that the application material will be retained and the applicant shall acknowledge its final disposal without any obligation.)

- The consent of the data subject to the processing of personal data contained in the CVs submitted to Versavica Kft. and the Oriolus Program operated by him for any purpose (for advertising purposes, spontaneously) must be presumed. If not used, personal data must be deleted.

Organizational arrangements for data processing and data protection tasks

In case of Versavica Kft. and the Oriolus Program operated by it, the Managing Director (and any person or persons authorized by her) shall perform the data processing and data protection tasks.

The Data Processing and Data Protection Officer in charge of Versavica Kft. and the Oriolus Program operated by it (currently the Managing Director):

- does the activities related to partner registers in the frame of cooperation with institutions, parents and guardians and staff registers,

- performs tasks arising from the processing and protection of databases,

- is obliged to continuously improve the data quality (accuracy, up-to-date status), performs the tasks defined in the legal and other regulations.

Data processing containing data only for statistical purposes, which constantly excludes

the establishment of a relationship between the data and the data subjects according to the provisions of Act on Statistics, is not the subject of the data protection record.

The National Data Protection and Freedom of Information Authority (NAIH) – in case of legal obligation - assigns a registration number to Versavica Kft as a data controller. The legal basis for the data controlling and processing of Versavica Kft. and the Oriolus Program operated by it is the Act CXII. 5. § 1. (a) point of the Act.

Versavica Kft. and the Oriolus Program operated by it as data controller ensure the security of the data; take the technical data protection and organizational measures and create the internal rules of procedure (access authorization system, etc.) appropriate to the local conditions of secure data processing.

Versavica Kft. and the Oriolus Program operated by it shall correct the inaccurate data within 15 days of becoming aware of it. The person concerned shall be notified of the rectification on request. The legal entity responsible for the operation of Oriolus Program and other programs of Versavica Kft. (Versavica Kft.) is liable for damages caused to other persons due to unlawful data processing of natural persons or violation of technical data protection requirements. It shall not be liable if proves that the reason for the damage was an unavoidable cause out of the scope of the data processing. No compensation for damages to the extent that it is the result of intentional or grossly negligent behavior of the injured person. In matters of compensation not regulated in this section, the provisions of the Civil Code shall be taken into account.

Data and privacy protection, confidentiality obligation

Versavica Kft.'s and its Oriolus Program's partner registry and its special elements are handled considering confidentiality rules, i.e. the personal data of the program participants, their parents, educators in case of minors, development of cultural relations, as well as the health, cultural, social and ethical information obtained in conflicts of interests which are covered by the obligation of confidentiality.

The data contained in the register of Versavica Kft. and the Oriolus Program operated by it may only be used for the performance of tasks related to partner registration, program arrangement and participant support, in such a way that the intended use of data can be controlled. Organizational tasks related to the registration of partners and participants shall be carried out in accordance with the laws on the protection of business secrets and personal data.

Information in the scope of sensitive data may be handled with the express consent of the data subjects; caution should be exercised when processing data.

Employees and subcontractors of Versavica Kft. and the administration organization of the Oriolus Program operated by it shall keep confidential any business secrets and personal social and other sensitive information of which they have become aware in the context and subject to the terms of their confidentiality declaration.

Voluntary statistical reporting

Pursuant to the act CXII of 2011 on Information Self-Determination and Freedom of Information and the act on Statistics the collection of data for statistical purposes shall be deemed to be subject to the express written consent of the data supplier to the statistical use of the data collected. Under the same legislation, it is possible to disclose the information collected, to provide information from such data, if the data provider expressly consents in writing to such use.

Interpretative provisions: According to GDPR

1. **"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;
2. **'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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. **"pseudonymisation"** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
4. **"filing system"** means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;
5. **"data 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;
6. **"data processor"** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
7. **"recipient"** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. Public authorities which

may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

8. **“third party”** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

9. **“consent of the data subject”** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

10. **“personal data breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

11. **„data concerning health”** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

12. **“cross-border processing”** means either:

(a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or

(b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

Versavica Kft. and the Oriolus Program operated by it process with personal data

- on the one hand: personal data of employees, agents/other partners cooperating in contractual relationship, as well as personal data of participants' parents and educators entered in the program;
- on the other hand: the personal data of clients, partners, natural persons acting on behalf of cooperating educational and public institutions;

Versavica Kft. and the Oriolus Program operated by it express in this Policy that their data controlling and data processing activities are always subject to the general principles contained in the provisions of the European Parliament and Council (EU) 2016/679. The itemized list of principles is the following:

Principles

1. Principle of *“lawfulness, fairness and transparency”*: Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

2. Principle of “*purpose limitation*”: Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

3. Principle of “*data minimization*”: Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4. Principle of “*accuracy*”: Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

5. Principle of “*storage limitation*”: Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the decree and subject to implementation of the appropriate technical and organizational measures required by the regulation in order to safeguard the rights and freedoms of the data subject.

6. Principle of “*integrity and confidentiality*”: Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

7. Principle of “*accountability*”: The data controller shall be responsible for compliance with the principles and shall be able to justify such compliance.

Versavica Kft. and the Oriolus Program operated by it express in this Policy it may only process data if it has an appropriate legal basis.

The appropriate legal basis for data controlling and data processing in Hungary is the current Act CXXII of 2011 on Information Self-Determination and Freedom of Information and, from 25 May 2018, the legal basis for data processing will be supplemented by the GDPR Regulation which adds the following to this Policy:

Lawfulness of processing

Processing shall be lawful only if and to the extent that at least one of the following applies:

a) **the data subject has given consent** to the processing of his or her personal data for one or more specific purposes;

Contributions shall always be voluntary, specific, well-informed and clear. Versavica Kft. and the Oriolus Program operated by it as a data controller obtain their consent

individually for all data processing purposes, and at the same time draw the attention of data subject to the right to withdraw the consent at any time in a simple manner.

b) processing is necessary for the **performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

Versavica Kft. and the Oriolus Program operated by it handle personal data prior to the conclusion of the employment contract on which the employment relationship is based or in connection with the employment contract entered into but in any case on the basis of a written declaration of consent and to the necessary extent of fulfillment in social insurance recording and registration duties.

(c) processing is necessary for compliance with a **legal obligation** to which the controller is subject; *Versavica Kft. and the Oriolus Program operated by it process personal data to the extent necessary to fulfill these obligations in order to provide information to any authority or office involved in payroll, tax, social contribution and foreign travel.*

(d) processing is necessary in order to **protect the vital interests** of the data subject or of another natural person;

(e) processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller;

Versavica Kft. and the Oriolus Program operated by it carry out public interest data processing in the sense that introducing students from other countries to the European culture is a task that may be an international goal due to international relations.

(f) processing is necessary for the purposes of the **legitimate interests pursued** by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Respect for and protection of the rights of data subjects

Versavica Kft. and the Oriolus Program operated by it, as data controller, shall take appropriate measures to ensure the rights of the data subject. The controller shall provide the data subject with all information and information regarding the processing of personal data in a concise, transparent, intelligible and easily accessible form, using clear and plain language in particular for any information addressed specifically to a child. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means.

1. Right to information

Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:

- (a) the identity and the contact details of the controller and of the controller's representative;
- (b) the purposes of the data processing
- (c) the legitimate interests pursued by the data controller (to indicate precisely the legal interest of the data controller or a third party);
- (d) the recipients of the personal data;
- (e) information and guarantees regarding personal data transfer to a third country
- (f) the period for which the personal data will be stored
- (g) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- (h) where the processing is based on consent the existence of the right to withdraw consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal);
- (i) the right to lodge a complaint with a supervisory authority;
- (j) whether the provision of personal data is a statutory requirement, the consequences of failure to provide such data;

Data providing shall not apply where and insofar as the data subject already has the information.

Where personal data have not been obtained from the data subject, the data controller shall provide the data subject with information about the personal data and its source.

In this case the time of information providing is

- up to 30 days
- the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject
- if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

Information providing is dispensable in the following cases:

- the data subject already has the information,
- the provision of such information proves impossible or would involve a disproportionate effort
- obtaining or disclosure is expressly laid down by law
- where the personal data must remain confidential subject to law

2. Right of access by the data subject

The data subject shall have the right to obtain from the controller access to the personal data and the following information:

- copies of personal data
- the purpose of the processing;
- the categories of personal data concerned;
- where the personal data are not collected from the data subject, any available information as to their source;
- the recipients
- information and guarantees with regard to data transfers to third countries
- period for which the data will be stored
- rights of the data subject
- the right to lodge a complaint with a supervisory authority;

Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

3) Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

Versavica Kft. and the Oriolus Program operated by it shall correct the inaccurate data within 15 days of becoming aware of it. The person concerned shall be notified of the rectification on request.

Versavica Kft. and the person responsible for the operation of the Oriolus Program operated by it shall be obliged to compensate the damage caused to others due to the unlawful processing of the data of the data subjects or the violation of technical data protection requirements. It shall not be liable for proving that the damage was caused by an unavoidable reason out the scope of the data processing. There is no need to compensate for the damage to the extent that it is the result of intentional or grossly negligent behavior of the injured party. In matters of compensation not regulated in this section the provisions of the Civil Code shall be considered.

4) Right to erasure

- The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to take the necessary measures
- Erasure does not apply to data handled by the data controller in accordance with the law.

5) Right to be forgotten

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.

Right for rectification and Right to be forgotten shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information,
- for compliance with a legal obligation,
- exercising of official authority vested in the controller,
- for archiving purposes in the public interest, scientific or historical research purposes,
- for a legal action.

6. Right to restriction of processing

At the request of the data subject, the controller shall limit the processing if:

- 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 required by the data subject to exercise 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 shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

A data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.

The controller shall inform any recipient to whom or which personal data have been communicated of a rectification, erasure or restriction, unless this proves impossible or involves a disproportionate effort.

7. Right to data portability

The data subject shall have the right to receive the personal data concerning him/her, which he/she has provided to a controller in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided if the processing is based on consent or on a contract.

The data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

8. Right to object

The data subject shall object in case of following legal basis:

- data processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller,
- the processing of data necessary to assert the legitimate interests of the controller or of a third party.

The data subject may also object to the processing of his/her personal data for direct marketing purposes.

The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise of legal claims.

At the latest at the time of the first communication with the data subject, the right to object shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

Legal remedy

The data subject is affected in case of violation of his/her rights

- may initiate court procedure (Metropolitan General Court, Budapest, 1055 Budapest, Markó utca 27, www.birosag.hu/torvenyszekek/fovarosi-torvenyszek) and
- may initiate investigations at the National Data Protection and Freedom of Information Authority (NAIH, 1125 Budapest, Erzsébet Szilágyi fasor 22/C, ugyfelszolgalat@naih.hu).

Versavica Kft. and the Oriolus Program operated by it comply with the following rules in the field of data processing in case of taking, using (publishing) a picture

2:43. of Act V of 2013 on the Civil Code highlights the protection of the right to the image: the infringement of individual rights means particularly the infringement of rights to the image and recording of sound. Versavica Kft. and the Oriolus Program operated by it shall avoid any unlawful conduct and refrain from any unlawful omissions during the course of data processing which are sanctioned by the Civil Code in case of infringements of rights on image and sound recording.

Under on the current legislation a person's face and image are considered to be personal data, while the taking and use of a photograph is considered as data processing and requires the consent of the data subject unless otherwise authorized by law. Basically, consent is required if the person in the picture is recognizable, especially if the picture is suitable for the individual's portrayal.

The consent of the data subject to the recording and the use of recording is not necessary in case of mass recording and recording of a public performance if the subject is portrayed as part of a mass. This includes, in particular, recordings made at events where recording is common, such as at events, trainings. In such a case, consent is not required even if the data subject is depicted in the crowd but individually highlighted. Unauthorized photographs may only be used in a circle that is justified by the circumstances under which they were taken, for example to record the event or for information.

Use (disclosure) of Versavica Kft. and the Oriolus Program operated by it:

Versavica Kft. and the Oriolus Program operated by Versavica Kft. and its online interfaces (Google interfaces as well as social media interfaces: Facebook, Youtube, Instagram, TikTok, etc.), online advertisements and on the website of Versavica Kft. and the Oriolus Program (oriolusprogram.org).

Special rules for minors

The data processing of children's personal information requires the authorization of the child or his/her legal representative.

In case of a child under the age of 14 the parent, in the age of 14-16 the child and the parent jointly, while in the age is over 16 (over 17 in India) the child are entitled to give consent.

In case of separated or divorced parents only the parent who is entitled to exercise parental authority can make a valid statement of consent - however, it is not the data controller's responsibility to investigate this matter in depth, it must be resolved by the competent authority (guardianship authority, law court).

Photographs of a child require a statement of parental consent. General authorization (statement of consent) means that the parent gives consent for the duration of the entire program to take photos, audio and video of the participants in the program. If the condition of any of the photographs specifically disturbs the child or parent concerned, the request for cancellation (or in case of a text request for correction) shall be complied promptly.

Data security regulations

The data controller shall apply the instructions for postal items and delivery of items sent personally to the address of Versavica Kft. and the Oriolus Program operated by him when handling documents containing personal data in all questions which are not regulated in this Policy.

Partner and client correspondence of Versavica Kft. and the Oriolus Program operated by it

In case of any questions or problems of the partners, clients or the participants' parents when using the service in relation to the service of Versavica Kft. and the Oriolus Program operated by it, the customer service may be contacted by phone or e-mail. The data controller will delete incoming mails, including the sender's name and e-mail address and any other personal information that is voluntarily provided within five years of the matter being settled.

Other data processing

Versavica Kft. and the Oriolus Program operated by it shall provide information about data processing not listed here at the time of data collection.

The mode of personal data storage, security of data processing

The IT systems and other data storage locations of Versavica Kft. and the Oriolus Program at the oriolusprogram.org website are located at the data controller's headquarters and online space.

Versavica Ltd. and the Oriolus Program operated by it will select and operate the IT tools used to process personal data in the provision of its services in such a way that the data processed:

- (a) accessible to those entitled (availability);
- (b) its authenticity and authentication are assured (authenticity of data management);
- (c) its unchangeability can be demonstrated (data integrity);
- (d) be protected against unauthorized access (confidentiality of data).

Tasks within the organization

The data controller shall ensure the security of the data; take the technical data protection and organizational measures and establish the internal rules of procedure (access authorization system, etc.) appropriate to the local conditions of secure data management.

Versavica Kft. and the Oriolus Program operated by it provide technical, institutional and organizational measures to protect the security of data processing that provide a level of protection appropriate to the risks associated with data processing.

Versavica Kft. and the Oriolus Program operated by it during the data processing retain

- (a) confidentiality: it protects the information so that only authorized persons have access to it;
- (b) integrity: protects the accuracy and completeness of the information and the method of processing;
- (c) availability: it ensures that when an authorized user needs it, he/she can have access to the information and tools that he/she needs.

Versavica Kft. and its Oriolus Program and its partners' IT systems and networks are protected against computer-fraud, espionage, sabotage, vandalism, fire and flood, as well as computer viruses, computer hacking and 'denial of service' attacks. Versavica Kft. and the Oriolus Program it operates provide security through server-level and application-level security procedures.

Versavica Kft. And the Oriolus Program operated by it perform their IT activities in a way that is ethical for the software and systems used. New technologies and software are constantly being used in the course of daily work. As a further development of the existing regulations, Versavica Kft. And the Oriolus Program operated by it prepare the IT security regulations. Its basic purpose is to ensure the application of the principles of data

protection and data security in the use of IT systems, to prevent unauthorized access, unauthorized alteration and disclosure of data.

The data controller organizes in-house training on data protection for its employees and strengthen the employees' data privacy awareness.

Handling a personal data breach

Any employee of Versavica Kft. and the Oriolus Program operated by it who is aware of a personal data breach, in particular unauthorized access, alteration, transfer, disclosure, deletion or destruction in relation to personal data controlled or processed by the data controller, shall be required to immediately announce it to the person acting on behalf of the data controller.

The person acting on behalf of the data controller shall investigate the announcement and may request further information from the employee (announcer) which the employee shall immediately fulfill.

Based on the investigation the person acting on behalf of the data controller shall take the necessary steps to remedy the personal data breach if it is possible.

The data controller shall ensure that any further action is taken, taking into account the risks, and inform the department specialized in data controlling or data processing.

The controller shall keep a record of the personal data breach.

The data controller shall notify the Authority immediately, but within 72 hours as the latest, if the personal data breach is likely to endanger the rights and freedoms of natural persons.

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the data controller shall communicate the personal data breach to the data subject without undue delay.

The communication to the data subject shall not be required if any of the following cases:

- the controller has implemented appropriate 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 authorized to access it;
- the controller has taken subsequent measures which ensure that the risk is no longer likely to materialize;
- communication would involve disproportionate effort, in such a case, there shall instead be a public communication whereby the data subjects are informed.

Entry into force

This Policy shall be applicable from the date of promulgation - December 9, 2019.

The managing director of Versavica Kft. and the Oriolus Program operated by it takes the

steps for the promulgation of this Policy at her own discretion.

Budapest, December 9, 2019

Viktória Bedő
Founder, Managing Director
Versavica Kft.
Oriolus Program