

## **Data Processing Notice** **Vodafone Hungary Foundation**

In order to comply with its obligations under the General Data Protection Regulation of the European Union ('GDPR'), the **Vodafone Hungary Foundation** (head office address: 1112 Budapest, Boldizsár utca 2., registration number: 01-01-0012339, hereinafter referred to as the Foundation) hereby provides information on its data processing practices related to the programmes it organises.

The Foundation has not appointed a Data Protection Officer, in matters of data protection the Foundation can be contacted by sending a regular letter to the Foundation's address or an e-mail to [foundation.hu@vodafone.com](mailto:foundation.hu@vodafone.com)

The Foundation carries out several data processing actions in connection with the programmes organised by the Foundation, which are described in the present Privacy Policy. It is true for each processing operation that the Foundation does not transfer the personal data processed to third countries or international organisations, nor does it carry out automated decision-making in respect of such.

The Foundation has involved Vodafone Hungary Zrt. as a data processor in its data processing operations (for the purpose of providing the infrastructure required for data processing).

In the course of data processing, GDPR grants data subjects the right to request the data controller to ensure access to (1), rectify (2), delete (3), restrict (4), transfer to another data controller (5) or exercise the right to object to the processing of (6) his or her personal data, depending on the legal basis of the processing. In the present information document, we indicate which data subjects' rights are relevant to each data subject, in the context of each data processing purpose.

Data subjects also have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information ([www.naih.hu](http://www.naih.hu)) or turn to the competent court in their place of residence or habitual residence ([www.birosag.hu](http://www.birosag.hu)) in the event of a breach of law.

### **CONTACTING THE FOUNDATION AND PROVIDING FEEDBACK TO THE FOUNDATION**

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The Foundation can be contacted through various platforms – e.g. directly, but also by filling in a contact form and providing feedback to the Foundation and in other similar ways.

However, the Foundation does not differentiate between establishing contact and providing feedback, nor does it treat them separately on the basis of the information they contain, and therefore treats them subject to the same data protection rules in all cases, from a general request for information to a specific matter.

The Foundation examines all the queries it receives and assesses them according to the information presented in them. The Foundation will examine the information contained in the query received and will process the data provided until the actions taken in relation to the information contained in the query have been completed, after which they will be deleted.

The person submitting the query may provide their name, e-mail address or other contact details, and the Foundation requests and reminds all parties concerned to send the Foundation only the

information required for dealing with the enquiry. The Foundation therefore considers that any information sent to it by a contact person is required and relevant for the purposes of the query.

***purpose of the data processing:*** to get in touch with the Foundation

***legal basis of processing:*** consent of the data subject pursuant to Section a), Section (1), Article 6 of the GDPR

***duration of data processing:*** until the matters raised in the query have been dealt with

***rights that may be exercised in relation to the processing:*** (1), (2), (3), (4), (5)

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**REGISTRATION FOR THE COMPETITION ORGANISED BY THE FOUNDATION**

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From time to time, the Foundation organises competitions for students. The competitions are open only subject to registration, and personal details must also be provided at the time of registration. In order to ensure efficient communication, each team can be registered by the teacher representing the team and identified as a contact person, who must provide the information required for registration on the relevant form (including the teacher's own name, the names of team members, the name of their institution, etc.). Foundation processes the data of teachers identified as contact persons, as well as of participating students in its quality as a data controller subject to Article 4.7 of the GDPR.

Since entering the competition is not mandatory for anyone, the Foundation considers that everyone enters the competition by free choice, and therefore assumes the consent of the data subjects as the legal basis for the data processing. This also applies to team members whose data are provided by their teacher. As the teacher identified as the contact person will certainly only register students for the competition who actually intend to participate, the Foundation considers that all the students concerned have the required information on data processing, pursuant to Sub-Section a), Section (5), Article 14 of the GDPR. The Foundation therefore asks teachers identified as contact persons to always provide data and register for the competition in a transparent manner, in agreement with the students. In this context, all teachers acting as contact persons are reminded that during the final, in-person competition, the Foundation will make video and photo recordings of the event, which will be shared through its communication channels. Some of the data relating to the competitions may also be accessed by members of the professional Jury for decision-making purposes.

***purpose of the data processing:*** registration for participation in the competition

***legal basis of processing:*** consent of data subjects pursuant to Sub-Section (a), Section (1), Article 6 of the GDPR

***duration of data processing:*** data provided during the registration will be processed by the Foundation until the end of the competition. If the Foundation wishes to process the data for a longer period for other purposes, it will provide specific information about it.

***rights that may be exercised in relation to the processing:*** (1), (2), (3), (4), (5)

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**PREPARATION OF COMMUNICATION MATERIALS FOR THE FINAL, IN-PERSON COMPETITION**

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The Foundation is committed to the opportunities offered by the digital world and to the next generation, and wants to get the word out about each competition to as many people as possible -

either to encourage others to take part in a future competition, or to get others to think about the future in a similar way.

For this reason, the Foundation will make audio and video recordings of the competitions' closing events, which will be shared through its own communication channels - and the Foundation will draw everyone's attention to it at the time of registration.

***purpose of the data processing:*** the communication of the competitions through the Foundation's communication channels

***legal basis of processing:*** legitimate interest of the Foundation pursuant to Sub-Section f), Section (1), Article 6 of the GDPR

***duration of data processing:*** the Foundation deletes unused recordings of the event within 30 days, and deletes used and published recordings from its own database and from communication channels after the end of the communication campaign

***rights that may be exercised in relation to the processing:*** (1), (2), (3), (4), (6)

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**REQUEST FOR INFORMATION ON FUTURE COMPETITIONS OF THE FOUNDATION**

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If a teacher acting as a contact person would like to be informed first-hand about future competitions for students organised by the Foundation, they do not need to browse the news. If the teacher acting as a contact person makes a declaration to this end during registration, the Foundation will send notification of all such future competitions. If you no longer wish to receive such information, you may change your mind at any time.

***purpose of the data processing:*** to notify you of future competitions for students organised by the Foundation

***data processed:*** name, e-mail address and the fact of subscription

***legal basis of processing:*** consent of the teacher acting as the contact person in accordance with Sub-Section a), Section (1), Article 6 of the GDPR

***duration of data processing:*** the Foundation will send the information to the teacher acting as the contact person until they declare to the Foundation that they no longer wish to receive such information

***rights that may be exercised in relation to the processing:*** (1), (2), (3), (4), (5)

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**PARTICIPATION IN THE PRIZE GAME ORGANISED BY THE FOUNDATION**

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From time to time, the Foundation announces prize games via its official communication channels (e.g. Facebook page or website). The aim of these prize games is to mobilise people interested in the Foundation's activities and to promote such activities.

Participation in the prize games and the provision of personal data is voluntary, subject to the terms and conditions of the prize games.

***purpose of data processing:*** to facilitate participation in the prize games, as well as to establish and maintain contact (e.g. in order to co-ordinate the delivery of the prize to the winners drawn).

**legal grounds of processing:** consent of the data subject pursuant to Section (1) a), Article 6 of the GDPR.

**duration of data processing:** the data provided when participating in the prize games will be processed by the Foundation until the conclusion of the prize games and related communication. If the Foundation wishes to process the data for other purposes for a longer period of time, it will inform the data subject separately.

**rights that may be exercised in relation to data processing:** Sections (1), (2), (3), (4) and (5).