

## Privacy Policy - CPAC Hungary 2024

The website [www.cpachungary.com](http://www.cpachungary.com) (hereinafter: Website) is owned by Jogállam és Igazság Nonprofit Korlátolt Felelősségű Társaság (registered office: 1121 Budapest, Budakeszi út 36/C.; company registration number: 24375223-2-43; hereinafter: JIN Kft. or Data Controller). The Website is operated by Art Supreme Korlátolt Felelősségű Társaság (registered office: 1085 Budapest, Röck Szilárd utca 11. IV. em. 26.; company registration number: 01-09-353968; hereinafter: Company) on behalf of JIN Kft.

The purpose of the Website is to provide the possibility to register for participation, and to provide essential information for those interested in the event named "CPAC Hungary", held in Budapest between April 25th and April 26th, 2024 (hereinafter: Event), jointly organized by the American Conservative Union Foundation (registered office: 1199 N Fairfax St, Suite 500, Alexandria, VA 22314, United States of America; phone: +1 (202) 347-9388; email: [contact@conservative.org](mailto:contact@conservative.org)) and the JIN Kft. The „Center for Fundamental Rights” and the „Alapjogokért Központ” trademarks appearing on the Website are registered with the EUIPO as European Union trademarks and owned exclusively by JIN Kft.

### 1. Acceptance of the Privacy Policy

Registration on the Website is subject to your consent to the processing of your data in accordance with this Policy. By checking the box "*I have read and accept the Privacy Policy and I consent to the processing of my data provided during registration in accordance with the Privacy Policy.*" you declare that you have read the contents of this Policy and give your expressed consent to the data processing under this Policy.

### 2. Definition of the Data Controller

**2.1.** The controller of your personal data is JIN Kft., which carries out data processing activities in accordance with 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 such data, and repealing Directive 95/46/EC (hereinafter: GDPR) and Act CXII of 2011 on the right of informational self-determination and freedom of information (hereinafter: Info Act).

**2.2.** You can contact the Data Controller at the following addresses:

- by mail: 1121 Budapest, Budakeszi út 36/C.;
- by email: [registration@cpachungary.com](mailto:registration@cpachungary.com);
- by phone: +3613294924.

**2.3.** Representative of the Data Controller: Dr. Miklós Géza Szánthó, Managing Director.

### 3. Legal Basis of Data Processing

The legal basis for processing your personal data is your consent (Article 6(1)(a) of the GDPR). In the specific case that you manifestly make public, during the Event or in relation to the Event, any personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs (special categories of personal data under Article 9(1) of the GDPR), the legal basis for processing such data shall be your decision to manifestly make it public (Article 9(2)(e) of the GDPR).

#### **4. Purpose of Data Processing**

The purpose of data processing is to facilitate communication related to the organization of the Event (such as admitting registered participants, informing them of any schedule changes, cooperating with participants' questions and requests), and to provide information about the results of the Event and the organization of similar events. Regarding image and sound recordings, the purpose of data processing is to broadcast the Event to a wider audience and to present the Event in the media and on the Data Controller's own platforms. In this respect the Data Controller and the media platform service provider are considered to be joint controllers by virtue of the underlying legal relationship between them.

For the purposes stated above, the Data Controller uses Messenger, Facebook, Instagram, (all the preceding three platforms being the products of Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; hereinafter "Meta Ireland"); Youtube (provided by Google) and X (provided by X Corp). For your personal data transferred to any of the Data Controller's pages on social media sites (e.g. a picture containing your image uploaded on JIN Kft's Facebook page), the Data Controller and Meta Ireland for Messenger, Facebook, Instagram; the Data Controller and Google for Youtube; the Data Controller and X Corp for X are considered as joint controllers of the joint processing ("Joint Processing") in application of Article 26 GDPR by virtue of the underlying legal relationship between them. The same applies to your activities carried out on the Data Controller's pages (e.g. liking a Facebook post). The information on Meta Ireland's processing required by Article 13(1)(a) and (b) GDPR can be found in Meta Ireland's Privacy Policy at <https://www.facebook.com/about/privacy>; Google; X Corp processing required by Article 13(1)(a) and (b) GDPR. The same information relating to Youtube can be found in Google's Privacy Policy at <https://policies.google.com/privacy?hl=en>. The same information relating to X can be found in X Corp's Privacy Policy at <https://twitter.com/en/privacy>. The purposes for which the collection and transmission of personal data that constitutes the joint processing takes place are the same as those stated above. Further information on how Meta Ireland; Google; and X Corp process personal data, including the legal basis Meta Ireland; Google; and X Corp rely on and the ways to exercise Data Subject rights against Meta Ireland, Google and X Corp can be found in Meta Ireland's Privacy Policy at <https://www.facebook.com/about/privacy> Google's Privacy Policy at <https://policies.google.com/privacy?hl=en>; X Corp's Privacy Policy at <https://twitter.com/en/privacy>. The Data Controller and Meta Ireland entered into the Controller Addendum available at [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum) to determine the respective responsibilities for compliance with the obligations under the GDPR with regard to the Joint Processing. The Data Controller and Meta Ireland have agreed that JIN Kft. is responsible for providing Data Subjects as a minimum with the information provided above, and that Meta Ireland is responsible for enabling Data Subjects' rights under Articles 15-20 of the GDPR with regard to the Personal Data stored by Meta Ireland after the Joint Processing. The Data Controller and Google; the Data Controller and X Corp have entered into the Controller Addendum by virtue of the underlying legal relationship between them (see at: <https://policies.google.com/privacy?hl=en>; <https://twitter.com/en/privacy>).

## 5. Scope of Personal Data Processed

The Data Controller requests specific personal data only during the use of the registration interface on the Website. The following personal data are requested during registration:

- name and identification document number (for identification purposes)
- age (to ensure full legal capacity)
- email address (for notifications)
- institution and position (for identification purposes)

In addition to the data provided during registration, the following personal data are processed in relation to the Event:

- image and sound (images and video footage taken by the media and official staff of the organizers for the purposes of information and marketing activities)

Special categories of personal data under Article 9(1) of the GDPR are only processed in the event that you decide to manifestly make them public, such as giving an interview, making a gesture of approval etc.

## 6. Duration of Data Processing

The Data Controller processes the personal data provided by you during registration:

a) in the case of a successful registration (i. e. providing you the opportunity for personal participation) , until 30 days after the Event, but no later than May 26, 2024;

b) in the case of an unsuccessful registration (i. e. not providing you the opportunity for personal participation) , until the start of the Event, but no later than April 24, 2024.

Regarding image and sound recordings made during the Event, the Data Controller processes personal data for a longer period, but for a maximum of 10 years, for the presentation of the Event and its own activities.

## 7. Your Rights Regarding Personal Data Processed by the Data Controller

**7.1. Right of Access [Article 15 of the GDPR]:** You have the right to receive feedback from the Data Controller on whether it is processing any of your personal data and, if so, to be informed of the purposes of the processing, the categories of personal data stored, the duration of the storage of the data and your rights in relation to the processing. Under this right, you may request that a copy of the personal data processed be provided to you, however this must not adversely affect the rights of others.

**7.2. Right to Rectification of Processed Data [Article 16 of the GDPR]:** Under the right of rectification, you may request the Data Controller to rectify inaccurate personal data concerning you without undue delay and to complete incomplete personal data, taking into account the purposes of the processing.

**7.3. Right to Erasure of Processed Data ("Right to Be Forgotten") [Article 17 of the GDPR]:** In the event that the Data Controller has unlawfully processed your personal data, you may request the Data Controller to delete the relevant personal data without undue delay. If the processing of your personal data is no longer necessary, the Data Controller shall automatically delete them on the grounds that the purpose of the processing has ceased to exist, at the latest after the expiry of the time limit specified for the processing.

**7.4. Right to Restriction of Processed Data [Article 18 of the GDPR]:** You have the right to request the Data Controller to restrict the processing of your personal data if one of the following conditions is met:

- a) you dispute the accuracy of your personal data (in this case, the restriction applies for the time necessary for the Data Controller to verify the accuracy of the personal data);
- b) the processing is unlawful, and you oppose the deletion of the data and instead request the restriction of their use;
- c) the Data Controller no longer needs your personal data for the purpose of processing, but you require them for the establishment, exercise, or defense of legal claims; or
- d) you have objected to the processing of your data for reasons related to your particular situation (in this case, the restriction applies for the time necessary to verify whether the legitimate grounds of the Data Controller override yours).

**7.5. Right to Data Portability [Article 20 of the GDPR]:** You have the right to receive the personal data provided to the Data Controller, based on your consent, in a structured, commonly used, machine-readable format, and you have the right to transmit this data to another controller without hindrance from the Data Controller.

**7.6. Right to Withdraw Consent [Article 7 of the GDPR]:** You have the right to withdraw your consent to the processing of your personal data at any time concerning the processing based on consent, but this does not affect the lawfulness of the processing carried out before the withdrawal. To withdraw your consent, for identification purposes, please contact the Data Controller from the email address you provided to the Data Controller writing to [registration@cpachungary.com](mailto:registration@cpachungary.com). Upon withdrawal of consent, the Data Controller will promptly arrange for the deletion of your personal data.

## **8. What You Need to Know About Image and Sound Recordings at the Event**

The Event is open to the press, and it will also be broadcast live on the internet. Representatives of the press and organizing organizations will participate in the Event and will take pictures and recordings. Concerning image and sound recordings the relevant legal provisions apply, including but not limited to Act V of 2013 on the Civil Code 2:48.§ (1) and (2) sections, according to which, consent of the individual is required for the production and use of image or sound recordings, except for mass recordings and recordings of public appearances. According to case law, a photograph is considered a mass recording if a large number of people are visible in it or if the persons depicted are seen as part of a crowd rather than as individual persons (e.g., a picture showing the audience of a lecture). A photograph in which the person is recognizable or by which the person can be clearly identified is considered personal data. The provisions of this Privacy Policy concerning such personal data-bearing photographs apply, with the differences set forth in this Privacy Policy, to these photographs as well.

## **9. Data Controllers and Data Processors**

In addition to designated employees of the Data Controller, personal data may be accessed by the designated employees of the Company entrusted by the Data Controller with the operation of the Website and by the designated employees of the Service Provider entrusted with providing access to the Event, Lounge Szolgáltató Rendezvényszervező Korlátolt Felelősségű Társaság (registered office: 1022 Budapest, Tövis utca 10.; company registration number: 01-09-329216; hereinafter: Lounge Kft.).

The above personnel may only access personal data for the performance of their duties, and they have undertaken a confidentiality obligation regarding the data they become aware of. The Company and Lounge Kft. qualify as data processors, performing their activities on behalf and in the interest of the Data Controller. The Data Controller only engages data processors that provide adequate guarantees to ensure compliance with legal requirements for data processing and the protection of the rights of data subjects through appropriate technical and organizational measures.

The Data Controller has made every reasonable effort to ensure that the data it processes is not accessible to unauthorized parties.

However, JIN Kft. advises visitors about the Website that when playing embedded YouTube videos, cookies used by YouTube may be installed, which may store personal data available to the operator of YouTube or another company, if applicable.

## **10. Remedies**

You are entitled to contact the Data Controller at the provided contact details at any time to assert your rights related to the processing of your personal data. The Data Controller will take the necessary measures in response to inquiries immediately, but no later than within 30 days, and will inform you accordingly. If you find the response from the Data Controller unsuccessful or believe that the Data Controller has restricted the enforcement of your rights, you may initiate an investigation by the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH) (registered office: 1055 Budapest, Falk Miksa utca 9-11., phone: +3613911400; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)), or you may initiate an administrative procedure by the NAIH or go to court in the event of a violation of the legal provisions regarding the processing of your personal data.