

Funside privacy statement (camp participation)

1. The data controllers

Funside Association, Funside School Ltd., Funside Events Ltd. (hereinafter collectively: Funside)

Seat: 1121 Budapest, Tündér lépcső 2/a., Hungary

Mailing address: 1111 Budapest, Szent Gellért tér 3., Hungary

E-mail: privacy@funside.hu

Phone: +36 1 950 9502

Website: www.funside.hu

2. Our data protection principles

All staff at Funside are aware of the responsibility for managing and protecting personal information. We do our job - handling such data only in the manner, for the time and to the extent absolutely necessary to provide our services, - and making sure that the data is constantly under high technological and physical protection.

Personal data will only be handled for purposes communicated to the subject. In some strictly controlled cases, it is necessary for the data to be processed or handled by our specific partners. (Such as a company providing information technology background for our newsletters, or the company insuring our campers). In these cases, we provide detailed information on data management and processing. Although this notice, to comply with applicable regulations, provides a reference to third-party data transfers, Funside actually never participates in data transfers for purposes such as third-party advertising, research or otherwise (the only exception is if we are required by law to provide data to authorities).

In terms of privacy and data protection, the "coming of age" is at 16, meaning that under this age, parents make decisions regarding the child's personal data, while those who are 16 or older make their own decisions. Funside staff members pay close attention to the responsible implementation of the rule, and work with the participants of the camps and courses with a view to data protection awareness and the values of information self-determination. We respectfully ask parents, too, to be mindful of this and other data protection issues. If needed, we are at your service!

3. Applicable data protection regulation

Data controller activities are governed by the following legislation:

- 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 (General Data Protection Regulation, GDPR; text available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>).
- Act CXII of 2011 (Hungary) on the Right of Informational Self-Determination and on Freedom of Information (Infotv.; text available at http://www.naih.hu/files/Privacy_Act-CXII-of-2011_EN_201310.pdf).

4. Information on instances of data collection

4.1. Data collection related to contracting and camp participation

4.1.1. Data collected

Participant's name, date and place of birth, mother's name, health insurance information (i.e. TAJ number, European Health Insurance number or private insurance data), mother tongue, knowledge of other languages, phone number, e-mail address, username. Name, phone number, e-mail address of the parents or other contacts, billing and payment information.

4.1.2. Purpose of data collection

Data collection is necessary for the conclusion of a service contract and for the use of the service.

4.1.3. Lawful base of data collection

The legal basis for data handling is a legal provision and the consent of the person or guardian concerned.

4.1.4. Access to data

Data can be accessed by specific members of Funside's staff.

4.1.5. Data processing and data transfer

Third parties are only involved in the processing of personal data with technological services (internet access, servers, billing and financial services etc.). The personal data provided to Funside will be processed by our partners solely for the purposes and in the manner described in this information, in accordance with the instructions of Funside, in compliance with safety ordinances.

Data processor partners:

- Szamlazz.hu - KBOSS.hu Kft., 1031 Budapest, Záhony utca 7.
- Naturesoft Magyarország Kft., 1113 Budapest Bocskai út. 77-79.
- BillSoft Hungary Kft., 7523 Kaposfő, Kossuth L. u. 176.
- Magyar Hosting Kft., 1132 Budapest, Victor Hugo u. 18-22.
- Recrovit Kft., 1113, Budapest, Bocskai út 75.
- Fodor Tamás e. v.
- Orbán Tamás e. v.

In order to ensure our camps' lawful and safe operation, we share some specific data with some specific partners:

- Zala Megyei Gyermekek és Ifjúsági Közalapítvány, 8900 Zalaegerszeg, Kossuth Lajos utca 47-51
- UNIQUA Biztosító Zrt., 1134 Budapest, Róbert Károly krt. 70-74.
- Volánbusz Zrt., 1091 Budapest, Üllői út 131
- ÉNYKK Északnyugat-magyarországi Közlekedési Központ Zrt., 9700 Szombathely, Körmendi út 92.
- EGYÉL-VELÜNK Közétkeztető Kft., 8314 Vonyarcvashegy, Déryné utca 9.
- Ré-busz 2009 Kft., 8200 Veszprém, Liszt Ferenc utca 1.
- Első Iskolabusz Kft., 1025 Budapest Kapu u. 13
- Skyfly Szolgáltató és Kereskedelmi Betéti társaság, 9027 Győr Kandó Kálmán u. 13/3
- Windsurf Camp Kft., 2040 Budaörs, Ady Endre utca 6.

- Décsy Attila e.v.
- Idrányi Péter e.v.

These partners provide services to campers as contracted and verified suppliers of Funside (meals, transportation, education services, and insurance). Each partner receives from Funside only data necessary for the particular service and handle the data only at the time the service is provided, as governed by the relevant regulations. The data may not be used for purposes other than the provision of the service.

In some of Funside's activities, participants will also generate information in third-party IT systems (e.g. username in software required for programming courses, web service logging). Since these are also personal data, although they cannot be linked to other personal data, Funside only cooperates with providers whose practices comply with EU, Hungary and Funside data management rules. Such partners are:

- Classcraft Studios Inc.
- MIT Media Laboratory (Scratch Team)

Classcraft (Canada) and MIT / Scratch (USA) are registered outside the European Union; both comply with the requirements of the European Data Protection Regulation (GDPR, item 3).

4.1.6. Duration of data retention

Data is retained as required by law, or until the consent expires or is revoked. Consent can be withdrawn at any time by email from the data subject to the email address privacy@funside.hu.

4.2. Data collected on the camper's medical statement

4.2.1. Data collected

Relevant information on the medical status of the camp participant.

4.2.2. Purpose of data collection

Data is collected to provide care for the campers, to prevent any possible problems, and to treat them as necessary.

4.2.3. Lawful base of data collection

The legal basis for data handling is a legal provision and the consent of the person or guardian concerned.

4.2.4. Access to data

Data can be accessed by specific members of Funside's staff.

4.2.5. Data processing and data transfer

No third party is involved in the processing of data. Medical data will be provided to healthcare professionals when needed.

4.2.6. Duration of data retention

Campers' medical data is processed until the end of the relevant camp.

4.3. Data collection related to customer management

4.3.1. Data collected

Participant's name, date and place of birth, mother's name, health insurance information (i.e. TAJ number, European Health Insurance number or private insurance data), health information (such as medication taken during the camp etc.), mother tongue, knowledge of other languages, phone number, e-mail address, username. Name, phone number, e-mail address of the parents or other contacts, billing and payment information.

4.3.2. Purpose of data collection

Data is collected to complete the contract, to track its current status for customers and for Funside, as well--, and to comply with legal requirements.

4.3.3. Lawful base of data collection

The legal basis for data handling is a legal provision and the consent of the person or guardian concerned.

4.3.4. Access to data

Data can be accessed by specific members of Funside's staff.

4.3.5. Data processing and data transfer

Third parties are only involved in the processing of personal data with technological services (internet access, servers etc.). The personal data provided to Funside will be processed by our partners solely for the purposes and in the manner described in this information, in accordance with the instructions of Funside, in compliance with safety ordinances.

Data processor partners:

- Szamlazz.hu - KBOSS.hu Kft., 1031 Budapest, Záhony utca 7.
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- Fodor Tamás e. v.
- Orbán Tamás e. v.

4.3.6. Duration of data retention

Data is retained as required by law, or until the consent expires or is revoked. Consent can be withdrawn at any time by email from the data subject to the email address privacy@funside.hu.

5. Data security measures

Personal data is securely stored on Magyar Hosting Kft., Recrovit Kft. servers, depending on which specific service is provided.

Physical copies can be held at Funside headquarters, other Funside premises, or at the camp sites. Sensitive personal data (such as medical data) are not stored electronically. Access to personal data is logged, which means that it is always possible to check who and when accessed specific information.

6. Data subjects' rights

6.1. Right of access

Data subjects - or their legal representatives - may write to the postal or electronic mail address provided above (1.) and request information about

- their personal data processed by Funside,
- the legal basis for this,
- the purpose of the data processing,
- the source of the data,
- the duration of data processing,
- access granted - to whom, when, on what legal basis,
- data transfers.

Funside will provide the requested information within a maximum of 30 days, sent to the address given by the person concerned.

6.2. Right to rectification

Data subjects - or their legal representatives - may request in writing to the postal or electronic mail address provided above (1.) that Funside corrects some of their personal data (such as a postal or electronic address). Funside will comply with the request within 30 days and provide written confirmation.

6.3. Right to erasure

Data subjects - or their legal representatives - may request in writing to the postal or electronic mail address provided above (1.) the deletion of their personal data. Funside will comply with the request, unless the fulfilment of a statutory or contractual obligation obliges the further storage of personal data. If there is no such obligation, Funside will complete the claim within 30 days and provide written confirmation.

6.4. Right to restriction of processing

Data subjects - or their legal representatives - may request in writing to the postal or electronic mail address provided above (1.) the restriction of the processing of personal data. Restriction takes place until the indicated reason makes it necessary. Funside will comply with the request within 30 days and provide written confirmation.

6.5. Right to object

Data subjects - or their legal representatives - may object in writing to the postal or electronic mail address provided above (1.) the forwarding of personal data for the purposes of direct marketing, public opinion or scientific research purposes. Funside will validate the request within 30 days and provide written information.

7. Complaints and enforcement

If you think the collection and processing of your data does not comply with our principles, our privacy statement, or the law, please contact Funsid by writing to one of the addresses above (1.). Our aim is to reach a quick, effective, commonly agreed negotiated settlement and promptly provide all information needed. If the problem is not resolved or you don't want to use this mode, you have the following enforcement options:

– You can apply with a complaint to the National Data Protection and Information Authority (NAIH). Seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C., Hungary; mailing address: 1530 Budapest, Pf.: 5., phone: +36 1 391 1400, e-mail: ugyfelszolgalat@naih.hu, website: <http://www.naih.hu>.

– You can file a civil lawsuit, which is judged by the regional court (“törvényszék”). According to the choice of the person concerned, it can be started even before the court of the place where she/he resides (see the list of courts and their contacts at the following link: <http://birosag.hu/torvenyszekek>).

This is a translation of the original document written in the Hungarian language. In matter of disputes, the original document shall prevail.