

## Website Privacy Policy

This Privacy Policy (hereinafter: **"Privacy Policy"** or **"Notice"**) is the result of the Semilab Foundation for the Support and Promotion of the (Education) of Natural Sciences (registered office: 1117 Budapest, Prielle Kornélia utca 4/A.; registration number: 01-01-0013484; represented by any two of the following: Anita Szincsák, Áron Pap, Dr. Anita Pongrácz, Dario Quintavalle and Dr. Imre Lajtos, hereinafter referred to as: **"Data Controller"** ) on the website operated by <https://alapitvany.semilab.hu> website (hereinafter referred to as **the "Website"**), in particular the characteristics of the collection, storage and use of data.

This Privacy Policy 16 June 2025 effective from the date of the meeting. The Data Controller shall make available the version of the Privacy Policy that is in force at any given time on its Website.

The Privacy Policy has been prepared on the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as the **"GDPR"**), its conceptual system is the same as that defined in Article 4 of the GDPR, taking into account the following legal acts:

- 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 referred to as the **"GDPR"**)
- Act CXII of 2011 - on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: **"Privacy Act"**)

In matters not specified in this Privacy Policy, the rules of the GDPR shall apply.

The Data Controller is entitled to prepare an extract from the content of this Privacy Policy in connection with certain data processing events, and may also ensure that the Data Subjects declare by signing this document that they have become acquainted with and acknowledged the contents of the extract in connection with the prior information related to the processing of personal data. The Data Controller reserves the right to amend this Privacy Policy. If the modification affects the use of the personal data provided by the Data Subject, the Data Subject shall be informed of the changes in an appropriate form, for example in the form of an e-mail information letter. If, as a result of the amendment of the Privacy Policy, the details of data processing also change, the Data Controller shall separately request the consent of the Data Subject.

Please read the information below carefully and only provide any personal information if you agree with what is written below.

### 1. THE DATA CONTROLLER

Name of the data controller	Semilab Foundation for the Support and Promotion of Science (Education)
Contact details of the Data Controller's e-mail:	alapitvany@semilab.hu
Registered office of the Data Controller:	1117 Budapest, Prielle Kornélia utca 4/A.
Data Controller's registration number:	01-01-0013484

## 2. DATA PROCESSING TERMS

The conceptual system of the Privacy Policy is the same as the concepts and definitions set out in Article 4 of the GDPR. Based on these:

**Data Processor:** the natural or legal person or organisation without legal personality, who or on the basis of a contract – including a contract concluded on the basis of a legal provision – processes data, the data processors used by the Data Controller are listed in Section 6 of this Privacy Policy.

**Processing:** refers to any operation or set of operations performed on personal data or data sets by automated or non-automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Data Controller:** a legal entity as defined in Section 1 of this Privacy Policy, which independently determines the purpose of data processing, makes and implements decisions related to data management, or has the data processor implement them.

**Data destruction:** the complete physical destruction of the data carrier containing the data.

**Data deletion:** making the data unrecognizable in such a way that it can no longer be recovered.

**Personal data breach:** a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**Recipient:** the natural or legal person, public authority, agency or any other body to whom the personal data is disclosed, whether or not it is a third party. Public authorities that may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not considered recipients; The processing of those data by those public authorities must comply with the applicable data protection rules in accordance with the purposes for which they are processed.

**EEA Member State:** a Member State of the European Union and another State party to the Agreement on the European Economic Area, as well as a State whose national enjoys the same legal status as a national of a State party to the Agreement on the European Economic Area on the basis of an international agreement concluded between the European Union and its Member States and a State not party to the Agreement on the European Economic Area.

**Data Subject:** any natural person identified or identifiable – directly or indirectly – on the basis of any personal data.

**Profiling:** any form of automated processing of personal data in which personal data is used to evaluate certain personal characteristics relating to a natural person, in particular to analyze or predict characteristics relating to performance at work, economic situation, state of health, personal preferences, interests, reliability, behavior, location or movement.

**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, a 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.

**Objection:** a statement by which the Data Subject objects to the processing of their personal data and requests the termination of data processing and/or the deletion of the processed data.

### 3. PRINCIPLES OF DATA PROCESSING

In the course of their activities, the Data Controller pays special attention to the protection of personal data, compliance with mandatory legal provisions, and safe and fair data management. The Data Controller shall treat the personal data provided to them confidentially in accordance with Section 4 of the Privacy Policy.

As informational self-determination is a fundamental right of every natural person enshrined in the Fundamental Law, the Data Controller considers it of utmost importance with regard to its individual data processing and data processing procedures that they are carried out only and exclusively in accordance with the provisions of the legislation in force, and with the following principles in mind, and that it develops its practice accordingly:

- With regard to the *principles of lawfulness, fairness and transparency*, the Data Controller processes personal data lawfully and fairly, as well as in a transparent manner for the Data Subject, in order to exercise a right or fulfil an obligation. The use of personal data processed by the Data Controller for private purposes is strictly prohibited by the Data Controller.
- With regard to the *principle of purpose limitation*, the Data Controller collects and processes personal data only for specified, unambiguous and lawful purposes, to the minimum extent and for the minimum time necessary to achieve these purposes, and does not process them in a manner that is incompatible with said purposes. Accordingly, the Data Controller will only use the personal data of the Data Subjects for the purposes communicated at the time of collection or for other appropriate purposes in accordance with the law.

The Data Controller pays special attention to ensuring that data processing complies with the principle of purpose limitation at all times, and that if the purpose of data processing has ceased to exist or the processing of data is otherwise unlawful, the data are deleted. If the personal data is no longer needed, the Data Controller will destroy them.

- With regard to the *principle of data quality (data minimisation and accuracy)*, the Data Controller processes and collects only the amount of personal data that is appropriate, relevant and necessary for the purposes of data processing. Furthermore, the Data Controller shall take reasonable measures to ensure that the personal data are accurate, complete and up-to-date, and that the personal data that is unnecessary for the purposes of data processing is deleted.
- In accordance with the *principle of limited storage*, the Data Controller processes the personal data enabling the identification of the Data Subjects only for the time necessary to achieve the purposes of data processing. Following the change or termination of the purpose of data processing, the Data Controller shall ensure the deletion of the data. The Data Controller shall store and may store the personal data for a longer period of time only if the personal data are processed for the purpose of archiving in the public interest, for scientific and historical research

purposes or for statistical purposes. You will take special care when discarding media containing personal data.

- With regard to the *principles of integrity and confidentiality*, the Data Controller ensures the closed, comprehensive, continuous and risk-proportionate protection of personal data, and takes organizational and technical measures in particular to establish protection against unauthorized or unlawful processing, accidental loss, destruction or damage to data. In order to protect the data against unauthorized use or disclosure, the Data Controller applies data security controls in its own activities.

The information security measures designed and implemented by the Data Controller ensure the confidentiality, integrity and availability of personal data. These measures are included in the Data Controller's IT security policy.

- With regard to the *principle of accountability*, the Data Controller plans and implements its data processing policies and develops its data management system in a way that it is able to verify compliance with the principles set out in this section at any moment of data processing, in particular when and in what form the personal data was recorded and what information the Data Subject received at the time of the recording of the personal data.

The Data Controller shall duly inform the Data Subjects with this Privacy Policy in accordance with Articles 13 and 14 of the GDPR.

The Data Controller, in their capacity as data controller, is obliged to ensure that the Data Subject has access to the data managed by the Data Controller—unless an exception is made by law—and may exercise the right to request information, access, rectification, restriction, deletion, data portability and the right to object.

#### **4. METHOD AND SECURITY OF DATA PROCESSING**

The Data Controller shall ensure the security of the data and shall take the technical and organizational measures and establish the procedural rules necessary for the enforcement of the data protection and confidentiality rules prescribed by the GDPR. The Data Controller protects personal data from unauthorized access; change; transmission; disclosure; or accidental deletion or destruction; injury; and the inaccessibility resulting from the change in the technique used.

The Data Controller places special emphasis on the protection of data files electronically managed in different registers in order to ensure that the data stored in different registers cannot be directly linked and assigned to the Data Subject, unless permitted by law.

If a personal data breach occurs at the Data Controller, the Data Controller shall report the personal data breach to the National Authority for Data Protection and Freedom of Information immediately after becoming aware of the data controller, but no later than within 72 hours of the Data Controller becoming aware of the breach, unless the incident is not likely to entail a risk to the rights and freedoms of natural persons. The Data Controller shall inform the Data Subjects if the personal data breach is likely to entail a high risk to the rights and freedoms of natural persons. Pursuant to Article 34 (3) of the GDPR, the Data Controller shall not inform the Data Subjects if any of the following cases apply:

- if the Data Controller has implemented technical, organizational and protective measures in relation to the data affected by the data breach - such as encryption - that prevent access to the data by unauthorized persons or make the data incomprehensible to them;
- if, after the occurrence of the personal data breach, the Data Controller has taken measures to ensure that the high risk identified is unlikely to materialize;
- if the information would require a disproportionate effort, in this case the Data Subjects must be informed by means of publicly published information, which may also be provided electronically.

## 5. DESCRIPTION OF EACH DATA PROCESSING

### 5.1. CONTACT

The Data Controller provides the opportunity to contact the Data Controller via one of the contact details of the visitors of the Website or by using the <https://calendly.com/> link on the Website.

<b>Purpose of data processing</b>	To provide contact with the Data Controller.
<b>Scope of processed data</b>	The name and e-mail address of the Data Subject, the content of the message sent.
<b>Scope of Data Subjects</b>	Persons establishing a relationship with the Data Controller.
<b>Legal basis of data processing</b>	According to Article 6(1)(a) of the GDPR, the explicit consent of the Data Subject.
<b>Data storage deadline</b>	Until the withdrawal of the consent and the investigation and response of the request.
<b>Method of data processing</b>	Electronically
<b>Data Source</b>	Data recorded from the Data Subject.
<b>Possible consequences of non-provision of data</b>	If the Data Subject does not provide the data to the Data Controller, he/she is not able to contact the Data Controller. The failure to provide data does not have any adverse legal consequences for the Data Subject.
<b>Automated decision-making and profiling</b>	The Data Controller does not use automated decision-making or profiling.
<b>Who can access your personal data?</b>	Competent employees of the Data Controller and employees of its data processors, if any. The effective list of the Data Controller's data processors is contained in Section 6 of this Privacy Policy.
<b>Data transmission</b>	Data is not transferred to a third country or to an international organization.

### 5.2. APPLYING FOR A PROGRAM ORGANIZED BY THE DATA CONTROLLER

The Data Controller provides an opportunity for persons visiting the application form of the Website to indicate their intention to participate in the Data Controller's program by filling in the application form.

<b>Purpose of data processing</b>	Sending an application to the Data Controller's program.
<b>Scope of processed data</b>	Name, e-mail address, telephone number, name of institution, city, postal code, expected number of participants, age group, expected time of arrival.
<b>Scope of Data Subjects</b>	Persons applying for the Data Controller's program

<b>Legal basis of data processing</b>	According to Article 6(1)(a) of the GDPR, the explicit consent of the Data Subject.
<b>Data storage deadline</b>	Until the withdrawal of consent and the examination and response of the application application.
<b>Method of data processing</b>	Electronically
<b>Data Source</b>	Data recorded from the Data Subject.
<b>Possible consequences of non-provision of data</b>	If the Data Subject does not provide the data to the Data Controller, he or she will not be able to apply for the Data Controller's program. The failure to provide data does not have any adverse legal consequences for the Data Subject.
<b>Automated decision-making and profiling</b>	The Data Controller does not use automated decision-making or profiling.
<b>Who can access your personal data?</b>	Competent employees of the Data Controller and employees of its data processors, if any. The effective list of the Data Controller's data processors is contained in Section 6 of this Privacy Policy.
<b>Data transmission</b>	Data is not transferred to a third country or to an international organization.

### 5.3. APPLICATION FOR THE EDUCATIONAL AWARD PROVIDED BY THE DATA CONTROLLER

The Data Controller provides an opportunity for persons visiting the application form of the Website to indicate their intention to apply for the Data Controller's educational award by filling in the application form.

<b>Purpose of data processing</b>	Sending the application for the Data Controller's educational award.
<b>Scope of processed data</b>	Name and e-mail address of the Data Subject.
<b>Scope of Data Subjects</b>	Persons applying for the Controller's educational award
<b>Legal basis of data processing</b>	According to Article 6(1)(a) of the GDPR, the explicit consent of the Data Subject.
<b>Data storage deadline</b>	Until the withdrawal of consent and the examination and response of the application application.
<b>Method of data processing</b>	Electronically
<b>Data Source</b>	Data recorded from the Data Subject.
<b>Possible consequences of non-provision of data</b>	If the Data Subject does not provide the data to the Data Controller, he or she will not be able to apply for the Data Controller's educational award. The failure to provide data does not have any adverse legal consequences for the Data Subject.
<b>Automated decision-making and profiling</b>	The Data Controller does not use automated decision-making or profiling.
<b>Who can access your personal data?</b>	Competent employees of the Data Controller and employees of its data processors, if any. The effective list of the Data Controller's data processors is contained in Section 6 of this Privacy Policy.
<b>Data transmission</b>	Data is not transferred to a third country or to an international organization.

#### 5.4. DATA PROCESSING RELATED TO THE SUPPORT CONTRACT

The Data Controller provides the opportunity to conclude a support contract with those Data Subjects pursuing university studies who have applied for the educational award provided by the Data Controller.

<b>Purpose of data processing</b>	Conclusion and performance of support contracts.
<b>Scope of processed data</b>	The name, place of birth, date of birth, mother's name of the Data Subject; address; and the bank account number.
<b>Scope of Data Subjects</b>	Persons applying for the educational award of the Data Controller, with whom the Data Controller concludes a support contract.
<b>Legal basis of data processing</b>	According to Article 6 (1) (b) of the GDPR, performance of a contract.
<b>Data storage deadline</b>	Until the contract is performed.
<b>Method of data processing</b>	Electronically
<b>Data Source</b>	Data recorded from the Data Subject.
<b>Possible consequences of non-provision of data</b>	If the Data Subject does not provide the data to the Data Controller, they will be unable to apply for the Data Controller's educational award. The failure to provide data does not have any adverse legal consequences for the Data Subject.
<b>Automated decision-making and profiling</b>	The Data Controller does not use automated decision-making or profiling.
<b>Who can access your personal data?</b>	Competent employees of the Data Controller and employees of its data processors, if any. The effective list of the Data Controller's data processors is contained in Section 6 of this Privacy Policy.
<b>Data transmission</b>	Data is not transferred to a third country or to an international organization.

#### 5.5. PUBLICATION OF PHOTOS AND VIDEOS TAKEN AT THE EVENTS ON THE WEBSITE

<b>Purpose of data processing:</b>	Recording the events at the events, publishing and using the recordings made on the User's Website, social media pages and other media surfaces.
<b>Scope of processed data:</b>	The image of the Data Subject, his voice, his name, the fact of his consent.
<b>Scope of Data Subjects</b>	Persons attending events organized by the Data Controller.
<b>Legal basis of data processing:</b>	Data Subject consent pursuant to Article 6(1)(a) of the GDPR.
<b>Deadline for data storage:</b>	<p>Until the withdrawal of the consent of the Data Subject.</p> <p>The Data Controller draws the attention of the Data Subjects to the fact that, due to the peculiarities of the internet, after the disclosure, the Data Controller has no influence on the redistributed content published on other places, portals, social media sites, etc., independent of the Data Controller, so after the withdrawal of the consent, it can only ensure the removal from the interface managed by the Data Controller.</p>



<b>Method of data processing:</b>	Electronically.
<b>Data source:</b>	Data recorded from the Data Subject
<b>Possible consequences of failure to provide data:</b>	The provision of personal data is not mandatory, it is not based on a legal obligation. The Data Controller shall not apply any adverse legal consequences in the event of refusal of consent.
<b>Automated decision-making and profiling:</b>	The Data Controller does not use automated decision-making or profiling.
<b>Who can access your personal data?</b>	Employees of the Data Controller and visitors to the Website.
<b>Transfer of data to a third country or international organization:</b>	Data is not transferred to a third country or to an international organization.

#### 5.6. DISPLAY OF BLOG POSTS ON THE WEBSITE ABOUT DATA SUBJECTS WHO HAVE WON THE STUDY FEE OF THE DATA CONTROLLER

<b>Purpose of data processing:</b>	Publication and use of the winners of the Controller's study fee on the User's Website, social media pages and other media surfaces.
<b>Scope of processed data:</b>	The image of the Data Subject, his voice, his name, the fact of his consent.
<b>Scope of Data Subjects</b>	Persons attending events organized by the Data Controller.
<b>Legal basis of data processing:</b>	Data Subject consent pursuant to Article 6(1)(a) of the GDPR.
<b>Deadline for data storage:</b>	Until the withdrawal of the consent of the Data Subject.  The Data Controller draws the attention of the Data Subjects to the fact that, due to the peculiarities of the internet, after the disclosure, the Data Controller has no influence on the redistributed content published on other places, portals, social media sites, etc., independent of the Data Controller, so after the withdrawal of the consent, it can only ensure the removal from the interface managed by the Data Controller.
<b>Method of data processing:</b>	Electronically.
<b>Data source:</b>	Data recorded from the Data Subject
<b>Possible consequences of failure to provide data:</b>	The provision of personal data is not mandatory, it is not based on a legal obligation. The Data Controller shall not apply any adverse legal consequences in the event of refusal of consent.
<b>Automated decision-making and profiling:</b>	The Data Controller does not use automated decision-making or profiling.
<b>Who can access your personal data?</b>	Employees of the Data Controller and visitors to the Website.
<b>Transfer of data to a third country or international organisation:</b>	Data is not transferred to a third country or to an international organization.

#### 5.7. DATA PROCESSING RELATED TO THE MAINTENANCE OF RECORDS RELATED TO THE EXERCISE OF DATA SUBJECT RIGHTS UNDER THE GDPR



<b>Purpose of data processing</b>	Data processing related to the maintenance of records related to the exercise of Data Subject rights under the GDPR.
<b>Scope of processed data</b>	The applicant's name, place and date of birth, mother's name, address, mailing address, request for exercising the right of the Data Subject under the GDPR.
<b>Scope of Data Subjects</b>	Person exercising a Data Subject right under the GDPR.
<b>Legal basis of data processing</b>	The legal basis for the processing is the fulfilment of a legal obligation pursuant to Article 6(1)(c) of the GDPR and the legitimate interest referred to in Article 6(1)(f) of the GDPR.
<b>Data storage deadline</b>	5 years from the assessment of the application.
<b>Method of data processing</b>	On paper and/or electronically.
<b>Data Source</b>	Data recorded from the Data Subject.
<b>Possible consequences of non-provision of data</b>	If the Data Subject does not provide the data to the Data Controller, the Data Controller is not in a position to assess the Data Subject's request.
<b>Automated decision-making and profiling</b>	The Data Controller does not use automated decision-making or profiling.
<b>Who can access your personal data?</b>	Competent employees of the Data Controller and employees of its data processors, if any. The effective list of the Data Controller's data processors is contained in Section 6 of this Privacy Policy.
<b>Data transmission</b>	Data is not transferred to a third country or to an international organization.

## 5.8. COOKIES

The Data Controller uses cookies on the Website, detailed information about which is available in the footer of the Website.

## 6. DATA PROCESSORS

The Data Processors do not make an independent decision, they are only entitled to act in accordance with the contract concluded with the Data Controller and the instructions received. The data processors record, manage and process the personal data transmitted to them by the Data Controller and managed or processed by them in accordance with the provisions of the GDPR. The Data Processors shall carry out data processing operations for the personal data provided by the Data Subjects within the time available for each data processing purpose specified in this Privacy Policy. The Data Controller uses the following data processors in connection with its data processing indicated in this Privacy Policy. The current list of data processors is available at the Data Controller.

	Data processor category	Purpose of data processing	Processing		
			Name	Seat	Registration number / registration number
	Hosting provider	Hosting service	WebDream Hungary Ltd.	1037 Budapest, Testvérhegyi lejtő 8/A.	01-09-908813

Contact	Contact	Calendly	Atlanta, Georgia	-
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## 7. ENFORCEMENT OF THE RIGHTS OF DATA SUBJECTS

The Data Subject may request information about the processing of their personal data, and request correction of personal data; restriction of processing; data from the Data Controller directly to the [alapitvany@semilab.hu](mailto:alapitvany@semilab.hu) e-mail address, and they have the right to data portability, legal remedy and the right to withdraw their consent. In Hungary the event of a complaint, the Data Subject may turn to the National Authority for Data Protection and Freedom of Information or, according to their choice, to the court in their territory. The General Court has jurisdiction in court proceedings.

In the case of fulfilling the Data Subject's request for personal data processing, the Data Controller shall identify the Data Subject in accordance with this Privacy Notice, taking into account the quality of the Data Subject (client, requester etc.), and the Data Controller shall only be entitled to comply with the Data Subject's request after the appropriate level of identification of the Data Subject.

If the applicant has not made their request related to personal data processing in accordance with the provisions of this Privacy Notice and the Data Controller has not been able to carry out the appropriate identification of the applicant (as required by this Privacy Notice) necessary for data security and/or protection of confidentiality (as defined in this Privacy Policy), the Data Controller shall call upon the applicant to rectify deficiencies. In the event of failure or non-fulfillment of which, the Data Controller will not be able to comply with the request.

The time elapsed between the request to provide the necessary personal data / the performance of the missing activity requested by the Data Controller and the provision of the personal data shall not be included in the deadline for responding to the request.

The Data Controller shall inform all recipients to whom the personal data have been disclosed of any correction, deletion or restriction of data processing, unless this proves impossible or requires a disproportionate effort. At the request of the Data Subject, the data controller shall inform the Data Subject about these recipients.

### a) Right to and access to information

In accordance with the obligation set out in Article 13 of the GDPR, the Data Controller is obliged to provide the following information on data processing to the Data Subjects, if the personal data originate from the Data Subject at the time of obtaining the personal data:

- a) the identity and contact details of the controller and its representative;
- b) contact details of the Data Protection Officer, if any;
- c) the purpose of the planned processing of personal data and the legal basis for the processing;
- d) the recipients and/or categories of recipients of the personal data, if any;
- e) the duration for which the personal data will be stored or, if this is not possible, the criteria for determining this period;
- f) information on the Data Subject's right to request from the controller access, rectification, erasure or restriction of processing of personal data concerning them, and to object to the processing of such personal data, as well as the Data Subject's right to data portability;
- g) in the case of processing based on consent, the right to withdraw consent at any time, which does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal;

- h) the right to lodge a complaint with a supervisory authority;
- i) whether the provision of personal data is based on a law or a contractual obligation or is a prerequisite for concluding a contract, as well as whether the Data Subject is obliged to provide the personal data, and what possible consequences may result from the failure to provide data.

If the personal data were obtained not from the Data Subject, the Data Controller shall provide the Data Subject with the above information, as well as the following information in accordance with Article 14 of the GDPR:

- a) categories of personal data concerned;
- b) the recipients or categories of recipients of the personal data, if any;
- c) the source of the personal data and, where applicable, whether the data originated from publicly available sources.

If the personal data were not obtained from the Data Subject, the Data Controller is obliged to provide the information:

- a) within a reasonable period of time from the date of receipt of the personal data, but no later than one month;
- b) if the personal data are used for the purpose of maintaining contact with the Data Subject, at least on the first contact with the Data Subject; or
- c) If the data are expected to be disclosed to other recipients, they must do so at the latest when the personal data are disclosed for the first time.

The obligation to provide information described above does not have to be complied with if:

- the Data Subject already has the information contained in these points,
- the provision of the information in question proves impossible or would require disproportionate effort,
- the acquisition or disclosure of the data is expressly required by the EU law applicable to the Data Controller or the Hungarian law in force, which also provides for appropriate measures to protect the legitimate interests of the Data Subject, or
- the personal data must remain confidential on the basis of a professional secrecy obligation imposed by EU or applicable Hungarian law.

The Data Subject's right of access includes, in accordance with Article 15 of the GDPR, the provision of the following information:

- purposes of data processing;
- categories of personal data concerned;
- the recipients to whom the personal data are or will be disclosed;
- the planned duration of storage of personal data;
- the rights of the Data Subject in the context of the processing of personal data;
- the source of the data, if it was not collected from the Data Subject;

- information about automated decision-making.

In all cases, the Data Controller strives to ensure that the information it provides to the Data Subject is as concise, transparent, understandable, easily accessible, clear and comprehensible as possible, even in compliance with the rules set out in the GDPR. The Data Controller is responsible for providing information and taking action. The Data Controller shall provide all information to the Data Subject in writing, including by electronic means. With regard to the data security rules set out in Articles 15 and 32 of the GDPR, the Data Controller shall only provide information to the Data Subject if the Data Controller is convinced of the identity of the Data Subject. If the identity is not verified, the Data Controller shall reject the Data Subject's request to exercise their rights and informs the Data Subject of the manner in which their rights are to be exercised.

The Data Controller shall inform the Data Subject within one month of the receipt of the request in the event of a request related to their rights contained in an appropriately communicated statement. Taking into account the complexity of the request and the number of requests, this one-month deadline may be extended by a further two months by sending a reasoned information to the Data Subject within one month from the submission/receipt of the request to the Data Controller.

Communication or receipt is considered appropriate if the Data Subject sends the written request to the official address of the Data Controller or to the e-mail address provided for this purpose and it arrives there.

Requests not communicated in accordance with the above will not be taken into account by the Data Controller.

Information and communication related to the processing of personal data must be easily accessible, understandable and must be formulated in clear and plain language. This principle applies in particular to informing Data Subjects of the identity of the controller and the purpose of the processing, as well as to the provision of further information in order to ensure the fair and transparent processing of their personal data, as well as to informing them that they have the right to obtain confirmation and information about the data processed about them.

The Data Controller shall provide the information and measures specified in this section free of charge, and the Data Controller shall charge no cost compensation only in the cases specified in Article 12 (5) of the GDPR.

#### **b) Right to rectification**

The Data Subject shall have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him or her without undue delay at his or her request. Taking into account the purpose of data processing, the Data Subject has the right to request the completion of incomplete personal data, including by means of a supplementary statement.

#### **c) Right to object**

The Data Subject may object to the processing of their personal data by making a statement addressed to the Data Controller, if the legal basis for data processing is

- Article 6 of the GDPR (1) (e) or
- legitimate interest pursuant to Article 6(1)(f) of the GDPR.

In the case of exercising the right to object, the Data Controller may no longer process the personal data, unless the Data Controller proves that the data processing is justified by compelling legitimate grounds that take precedence over the interests, rights and freedoms of the Data Subject, or that are related to the submission, exercise or defense of legal claims. In connection with the determination that the data processing is justified by compelling legitimate reasons, the management of the Data Controller decides.

It informs the person concerned of its position in this regard in an opinion. For the period up to the date of determination, personal data will be appropriately restricted.

In the case of data processing based on the Data Subject's consent (Article 6(1)(a) of the GDPR), the Data Subject does not have the right to object.

#### **d) Right to restriction of processing**

Data processing may be restricted if:

- the Data Subject disputes the accuracy of the data, the Data Controller restricts the processing of personal data for the period until the accuracy of the data is established;
- the processing is unlawful, and the Data Subject requests the restriction of use instead of deletion;
- the data controller no longer needs the data, but the Data Subject requires them to make legal claims;
- the Data Subject objects to the processing of personal data in accordance with Article 21 of the GDPR, to the extent that the objection is considered

For the duration of the assessment of the Data Subject's objection to the processing of his or her personal data, but not more than for 5 days, the Data Controller shall suspend the data processing, examine the justification of the objection and make a decision of which the applicant shall be informed.

If the objection is justified, the data shall be restricted by the Data Controller, i.e. only data storage may be carried out as data processing until:

- the Data Subject consents to the processing of their data;
- the processing of personal data is necessary for the enforcement of legal claims;
- the processing of personal data becomes necessary to protect the rights of another natural or legal person; or
- law orders data processing in the public interest.

If the Data Controller lifts the restriction of data processing, it shall inform the Data Subject at whose request the restriction was made of the fact of the lifting of the restriction in writing prior to the lifting of the restriction, unless this proves impossible or requires a disproportionate effort. If the Data Subject has requested the restriction of data processing, the Data Controller shall inform the Data Subject in advance of the lifting of the restriction.

#### **e) Right to erasure ("right to be forgotten")**

The Data Subject shall have the right to obtain the Data Controller's request to delete the personal data relating to him or her without undue delay, and the Data Controller shall be obliged to delete the personal data relating to the Data Subject without undue delay if one of the following reasons applies:

- a) the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- b) the Data Subject withdraws his/her consent on which the data processing is based and there is no other legal basis for the data processing;
- c) the personal data have been unlawfully processed;
- d) the personal data must be erased in order to comply with a legal obligation imposed on the controller by Union or Member State law;
- e) Personal data was collected in connection with the provision of information society services.

The Data Subject's right to erasure may only be restricted in the case of the following exceptions set out in the GDPR, i.e. despite the existence of the above reasons, the continued storage of personal data may be considered lawful if it is necessary for the following:

- a) the exercise of the right to freedom of expression and information, or
- b) if compliance with a legal obligation (i.e. a legal obligation in the Data Management Register in the case of an activity with a legal basis for a period corresponding to the purpose of data processing), or
- c) for the performance of a task carried out in the public interest, or
- d) for the exercise of official authority vested in the controller, or
- e) in the public interest concerning public health,
- f) for archiving purposes in the public interest, or
- g) for the purposes of scientific and historical research or statistical purposes, or
- h) for the establishment, exercise or defense of legal claims.

**f) Right to data portability**

The Data Subject has the right to receive the personal data concerning them that they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and shall have the right to transmit these data to another data controller without hindrance from the controller to whom the personal data have been made available, if:

- the legal basis for the processing is the consent of the Data Subject or the processing was necessary for the performance of a contract to which the Data Subject is a party or necessary to take steps at the request of the Data Subject prior to the conclusion of the contract [Article 6(1)(a) or (b) and Article 9(2)(a) of the GDPR]
- The processing is carried out by automated means.

The Data Subject does not have the right specified in this section if the data 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 Data Controller, or if this right would adversely affect the rights and freedoms of others.

If the Data Controller has to disclose personal data to a person other than the Data Subject on the basis of the Data Subject's right to data portability, the Data Controller informs and calls on this third party within the framework of this Data Processing Notice that the personal data provided by the Data Controller in respect of the Data Subject may not be used for its own purposes, and these personal data

only in accordance with the provisions of the relevant data protection legislation, you can manage it in a purpose-bound way. The Data Controller shall not be liable for the use by third parties of personal data duly transmitted to third parties at the request of the Data Subject.

**g) Right to withdraw consent**

If the legal basis for the processing of the Data Subject's personal data by the Data Controller is the consent of the Data Subject, the Data Subject may withdraw his or her consent to data processing at any time. In this regard, the Data Controller informs the Data Subjects that the Data Controller may process the personal data of the Data Subject even after the withdrawal of the consent given by the Data Subject for the purpose of fulfilling its legal obligation or enforcing its legitimate interests, if the enforcement of the interest is proportionate to the restriction of the right to the protection of personal data.

**8. LEGAL REMEDY**

The Data Subject has the right to contact the Data Controller directly at the following e-mail address with their complaints or to redress violations to their rights: [alapitvany@semilab.hu](mailto:alapitvany@semilab.hu) .

If the Data Subject considers the data processing of the Data Controller to be injurious, they may file a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., telephone number: +36 (1) 391-1400, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)).

The Data Subject may turn to a court in order to protect their data, which will proceed in the case out of turn. In this case, the Data Subject may freely decide whether to go before the regional court (<http://birosag.hu/torvenyszekek>) belonging to their place of permanent or temporary residence. The court pertaining to the address of the Data Subject's residence can be found here: <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>