## **Privacy Notice**

If you contact us at info@greenpolicycenter.com or subscribe to our newsletter, you will automatically provide us with the necessary personal data (e.g. name, e-mail address, etc.). At the same time, data protection is of paramount importance to the Green Policy Center, so we have summarized the most important information related to the processing of your personal data below

Who handles your personal data?

Personal data is handled by the trademark owner of the Green Policy Center, Climate Champion Partners Nonprofit Kft. Regulation (EU) lawfully processes your personal data according to the relevant Hungarian and EU data protection legislation, i.e. Act CXII of 2011 on the right to informational self-determination and on the freedom of information and the 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.

Name: Climate Champion Partners Nonprofit Kft.

Headquarters: 1125 Budapest, Dániel út 23 / E 3rd floor. 15th

Company registration number: 01-09-357372

Tax number: 27926787-1-43

# I. Inquiries via e-mail

Legal basis for data management:

The data management of the Ltd. is necessary to enforce the legitimate interests of the data controller or a third party.

The purpose of data management:

We will only use your personal data to fulfill the requests contained in your request and to answer your questions.

Scope of data managed:

Your e-mail address and the information you provide to us in the e-mail sent to us.

How long do we store your data?

We will store your personal data for the period specified in the above, but for a maximum of 6 months. If you do not contact us again after 6 months, your data will be permanently deleted.

Access to data:

Only a designated employee of the Ltd. has access to your data. You can contact him at any time at info@greenpolicycenter.com.

Where do we store your data?

We store your data in Hungary.

Your rights:

Access right:

You have the right to request information about the personal data we hold about you at any time. Contact us and we will provide you with access to the purpose, duration, legal basis, the scope of the data processed or any other information related to the processing of your personal data.

Right of correction:

You have the right to request the correction of your personal data if it is incorrect, including the right to have incomplete personal data rectified.

Right of cancellation:

You have the right to request that the Ltd. delete the personal data processed by it concerning you without undue delay, if any of the following reasons exist:

- if the personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- if you object to the processing and there is no overriding legitimate reason for the processing;
- if your personal data has been processed unlawfully;
- if personal data must be deleted in order to fulfill a legal obligation under EU or Hungarian law.

Right of restriction:

You have the right to request that the Ltd. restrict the processing of your personal data if the data processing is illegal and you object to the deletion of your personal data.

In case of a complaint, you can contact:

You can contact us at any time at the e-mail address info@greenpolicycenter.com. We have appointed a Privacy Officer to ensure that your personal information is always handled in a transparent and lawful manner. If you think that the Ltd. is acting illegally in connection with your personal data, please contact us. You also have the right to complain to the supervisory authority in the context of a data protection authority procedure. In case of violation of your rights, you can also go to court against the data controller, the case will be dealt with pursuant to an expedited procedure.

# II. Newsletter subscription

We inform the subscribers about our events, our new publications and other information of interest through a newsletter. By subscribing to this newsletter, you give your consent to be contacted by newsletters about our company.

Subscribing to the newsletter - in addition to sending the newsletters - is not a condition of any of our services.

The purpose of data management is to send a newsletter.

**Legal basis for data processing:** consent of the data subject [GDPR Article 6 (1) (a)].

**The range of personal data processed:** surname and first name, name of the institution, e-mail address

**Duration of data management:** until unsubscribing from the newsletter.

**Possible consequences of failure to provide data:** The data subject does not receive a newsletter from our company.

**Rights of the data subject:** the data subject (the person whose personal data is handled by our company)

- (a) may request information on the processing of personal data concerning him or her and access to such personal data,
- b) request their correction,
- (c) request their cancellation,
- d) may apply for a restriction on the processing of personal data under the conditions set out in Article 18 of the GDPR (i.e. that our company does not delete or destroy the data until requested by a court or authority, but for no longer than thirty days, and it does not handle them for other purposes)
- e) may object to the processing of personal data,
- (f) exercise its right to data portability. Under the latter right, the data subject is entitled to receive personal data concerning him or her in word or excel format, and our company is also entitled to transfer this data to another data controller upon request.

You can unsubscribe from the newsletter at any time by sending an email to our company at info@greenpolicycenter.com. In this case, your personal data related to sending the newsletter will be deleted from our database immediately.

#### Other information about data management:

Our company takes all necessary technical and organizational measures to avoid a possible data protection incident (e.g. damage, loss of personal data files, making them accessible to unauthorized persons). In the event of an incident that occurs, a record is kept to verify the necessary action and to inform the data subject, including the scope of the personal data

concerned, the scope and number of data subjects, the date, circumstances, effects and remedies of the data protection incident as well as other data specified in the legislation prescribing data management.

## How to store personal data, data security

Our company's computer systems and other data storage locations can be found at the headquarters. The IT tools used to manage personal data during the provision of the service are selected and operated in such a way that the managed data:

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

We pay particular attention to data security, take the technical and organizational measures and establish the procedural rules necessary to enforce the guarantees under the GDPR. The data shall be protected by appropriate measures, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage or inaccessibility due to changes in the technology used.

#### Rights of the data subjects, legal remedies

The data subject may request information on the handling of his / her personal data, as well as request the correction of his / her personal data, - with the exception of mandatory data processing - deletion, revocation, exercise his / her right to carry data and object in the manner indicated at the time of data collection via contacting us (details above).

At the request of the data subject, the information shall be provided in electronic form without delay, but no later than within 30 days. Requests from data subjects to comply with the rights below will be complied free of charge.

## **Right to information:**

Our company shall take appropriate measures to provide the data subjects with all the information on the processing of personal data referred to in Articles 13 and 14 of the GDPR and shall be provided in a concise, transparent, comprehensible and easily accessible form, in a clear and precise manner according to Articles 15 to 22 and Article 34 of the GDPR.

The data subject may request information on the handling of his / her personal data, as well as request the correction of his / her personal data, - with the exception of mandatory data processing - deletion, revocation, exercise his / her right to carry data and object in the manner indicated at the time of data collection via contacting us (details above).

At the request of the data subject, the information shall be provided in electronic form without delay, but no later than within 30 days. Requests from data subjects to comply with the rights below will be complied free of charge.

The right to information can be exercised in writing through the contact details provided. Upon request, the data subject may be provided orally with proof of identity. If the employees of our company have any doubts about the identity of the data subject, we may request the provision of the information necessary to confirm the identity of the data subject.

## The data subject's right of access:

The data subject has the right to receive feedback from us as to whether the processing of your personal data is in progress. Where personal data are being processed, the data subject shall have the right to access the personal data and the following information listed:

- the purposes of data management;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom or with whom the personal data have been or will be communicated, including, in particular, recipients in third countries (outside the European Union) or international organizations;
- the planned duration of the storage of personal data;
- the right to rectify, erase or restrict data processing and to object;
- the right to lodge a complaint with the supervisory authority;
- information on data sources; the fact of automated decision-making, including profiling, and comprehensible information on the logic used and the significance of such data management and the expected consequences for the data subject.

In addition to the above, in the event of a transfer of personal data to a third country or to an international organization, the data subject is entitled to be informed of the appropriate guarantees for the transfer.

### **Right of correction:**

Under this right, anyone may request the correction of inaccurate personal data we hold about them and the addition of incomplete data.

## Right of cancellation:

The data subject has the right to request cancellation of his/her personal data without undue delay based on any of the following reasons:

- (a) personal data are no longer required for the purpose for which they were collected or otherwise processed;
- (b) the data subject withdraws his or her consent on which the processing is based and there is no other legal basis for the processing;
- (c) the data subject objects to the processing and there is no overriding legitimate reason for the processing;
- (d) unlawful processing of personal data has been established;
- (e) personal data must be deleted in order to fulfill a legal obligation to which the controller is subject under Union or Member State law;
- (f) personal data have been collected in connection with the provision of information society services.

Deletion of data may not be initiated if the data processing is necessary for the following purposes:

- (a) for the purpose of exercising the right to freedom of expression and information;
- (b) for the purpose of fulfilling an obligation under Union or Member State law applicable to the controller to process personal data or performing a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) in the field of public health, or for archival, scientific and historical research or statistical purposes, in the public interest;
- (d) or to bring, assert or defend legal claims.

## Right to restrict data processing:

At the request of the data subject, we limit the processing to the conditions under Article 18 of the GDPR, i.e. if:

- (a) 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;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or

(d) the data subject has objected to the processing; in that case, the restriction shall apply for as long as it is established whether the legitimate reasons of the controller take precedence over the legitimate reasons of the data subject.

If the processing is restricted, personal data other than storage may be processed only with the consent of the data subject or for the purpose of bringing, enforcing or protecting legal claims, protecting the rights of another natural or legal person or in the important public interest of the European Union or a Member State. The data subject must be informed in advance of the lifting of the data processing restriction.

#### Right to carry data:

The data subject shall have the right to receive the personal data concerning him or her made available to the controller in a structured, widely used, machine-readable format and to transmit such data to another controller.

Our company can fulfill such a request of the person concerned in Word or Excel format.

## Right to object:

Where personal data are processed for the purpose of direct business acquisition, the data subject shall have the right to object at any time to the processing of personal data concerning him for that purpose, including profiling, in so far as it relates to direct business acquisition. In the event of an objection to the processing of personal data for the purpose of direct business acquisition, the data may not be processed for this purpose.

### Automated decision making in individual cases, including profiling:

The data subject shall have the right not to be covered by a decision based solely on automated data processing, including profiling, which would have legal effects on him or her or would be similarly significant. The above authority does not apply if the data management

- (a) is necessary for the conclusion or performance of a contract between the data subject and the controller;
- (b) is governed by European Union or Member State law applicable to the controller which
- (c) also lays down appropriate measures for its protection; or
- (d) is based on the expressed consent of the data subject.

## Right of withdrawal:

The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of the consent-based data processing prior to withdrawal

## **Rules of procedure:**

Our company will inform the data subject on the action taken in accordance with Articles 15-22 of the GDPR without undue delay, but in any case within one month of receipt of the request. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. Our company will inform the person concerned about the extension of the deadline, indicating the reasons for the delay, within one month from the receipt of the request.

If the data subject has submitted the request electronically, the information shall be provided electronically, unless the data subject requests otherwise.

If our company does not take action at the request of the data subject, we will inform the data subject without delay, but no later than within one month of receipt of the request, of the reasons for non-action and that the data subject may lodge a complaint with the supervisory authority and may exercise his/her right of judicial review.

We will inform all recipients of any rectification, erasure or restriction on the processing of data to which the personal data have been communicated, unless it proves impossible or requires a disproportionate effort. The data subject will be informed of these recipients upon request.

## **Compensation and damages:**

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of data protection rules is entitled to compensation from our company or data processors for the damage suffered. Data processors are liable for damages caused by data processing only if they have not complied with the legal obligations specifically imposed on data processors, or if our company's legal instructions have been disregarded or acted contrary to them. If several controllers or processors or both controllers and processors are involved in the same processing and are liable for damages caused by the processing, each controller or processor shall be jointly and severally liable for the total damage.

Our company or the data processor are released from liability if they prove that they are not liable in any way for the event that caused the damage.

### Right to go to court and official data protection procedure:

If the data subject considers that our company has violated the right to the protection of personal data in the course of data processing, he or she may appeal to the competent authorities in accordance with the applicable legislation as follows:

 you can file a complaint with the National Authority for Data Protection and Freedom of Information address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / c.;

website: www.naih.hu;

e-mail address: ugyfelszolgalat@naih.hu;

phone: +36-1-391-1400

(herinafter: "NAIH")

- he/she may apply to the competent court

The case will be dealt with pursuant to an expedited procedure.

Our company undertakes to cooperate in all respects with the relevant court or the NAIH in these proceedings, and to provide the data processing data to the NAIH or the relevant court.

## Miscellaneous provisions

We undertake that the data management in accordance with this document complies with the requirements set out in all the documents covering the data management of our company, as well as in the applicable legislation.

We reserve the right to change this document at any time by informing those concerned of any changes by posting the changes on our company's website.

If you have any questions about the content of this document, please write an e-mail to us!

Last updated: July 19, 2020