

# GENERAL INFORMATION ON DATA PROCESSING ACTIVITIES

[CraftHack online hackathon]

**CraftHub Kft.** (hereinafter: „Company”), (registered seat: 1037 Budapest Jablonka út 31. Hungary, registration number: 01-09-373899, represented by Károly Varga CEO) (“we” or “Organizer”) organizes the CraftHack online hackathon (the “Event”) and provides the <https://crafthack.crafthub.events/> site (together the “Website”) relating to such Event. For these purposes the Organizer may collect and process personal data of the users of the Website and the participants, applicants and other online visitors of the Event.

The purpose of this Privacy Policy is to clarify and inform the applicants, participants, and other visitors of the Event and the users of the Website (all the individuals mentioned above referred to as “Users” or “you”) on how their personal data is processed and stored.

The purpose of the Policy is also to inform the data subjects before the processing of data on the method of the data handling of the Organizer and the facts, rights and obligations related to data processing.

In this Privacy Policy, the Website and the services offered on the Website (including the Event) are collectively referred to as the “Services”.

This Privacy Policy may be modified or updated from time to time if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on the Website. Continuing to use the Services after we publish changes to this Privacy Policy means that you are consenting to the changes.

The legal background of this Privacy Policy is mainly:

– 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), on the other hand

– the Act CXII of 2011 on the right to information self-determination and information freedom (Infotv.)

## 1. THE CONTROLLER’S CONTACT DETAILS

Name: CraftHub Kft.

Represented by: Károly Varga

Post address: 1037 Budapest Jablonka út 31

E-mail: karoly.varga@crafthub.events

## 2. DEFINITIONS

Below you can find the definitions of the most important legal terms used in this Privacy Policy:

- *data subject*: an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly;
  
- *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, an identification 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;
  
- *genetic data*: means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
  
- *biometric data*: means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
  
- *data concerning health*: means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
  
- *consent of the data subject*: means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
  
- *objection*: a statement of the data subject, in which he or she objects to the processing of his or her personal data, and requests the termination of processing and/or the deletion of personal data;
  
- *controller*: the natural or legal person who determines the purposes and means of the processing of personal data;
  
- *data processing*: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by 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;

### **3. TYPES OF PERSONAL DATA AND SOURCES OF DATA**

#### **3.1 User Data**

The Organizer collects and processes the following User Data received from the Users via registration/application forms completed on the Website or by email, User Data received from the Users on the phone, or communicated by any other means.

User Data shall mean the following **types** of information:

- Name,
- Age,
- E-mail address,
- Country of residence,
- Nationality (optional),
- LinkedIn Profile (optional),
- any other personal data (e.g. photo, phone number, etc.) shared by the User throughout the use of the Services.

The **purpose** of processing these personal data is to be able to offer the Services to the Users, to organize the Events as well as for User verification. We process personal data for the evaluation and selection of potential applicants and team members for the Events. We also process personal data for the purpose of maintaining our customer relationships with the Users, for instance by contacting the Users regarding the Services and Events. We also process personal data of the Users in order to inform the Users of changes relating to the Services and the Events. We process the address of the Users to send them the materials necessary for the participation in the Event.

The **legitimate ground** for processing User Data is the consent of the User given upon registration to the Event and our obligation to perform our contractual obligations towards the Users with respect to the Users having applied or registered as participants or attendees in the Event. The contract is entered into by and between the Company and the User according to the terms set forth in the Terms and Conditions.

#### **3.2 Statistical Data**

The Company processes the personal data of the Users in order to create various statistical reports about the Event. Statistical Data entails the following **types** of personal data of the User:

- Country of residence
- nationality (optional)
- which university he/she attends;
- skills (optional)

The **purpose** of processing Statistical data is to create various statistical reports about the Event and to develop the quality of our Services and Events.

The **legitimate ground** for processing Statistical Data is the legitimate interest of the Company. Our legitimate interest is based on running, maintaining and developing our business,

improving the customer or visitor experience of the Users. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy. Statistical Data is predominantly non-identifiable data; therefore, our legitimate business interest supersedes the risk of our processing activities affecting your right to privacy.

### **3.3 Cookies**

We use various technologies to collect and store Analytics Data and other information when the Users visit the Website, including cookies and web beacons.

Cookies are small text files sent and saved on your device for the **purpose** of allowing us to identify visitors of the Website and facilitate the use of the Services and to create aggregate information of our visitors. This helps us to improve the Services and better serve our Users. The cookies will not harm your device or files.

The **legitimate ground** for the use of cookies is our legitimate business interest to tailor the Services and the information we provide in accordance with the individual interests of our Users.

The Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

- [Safari](#)
- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)

Please note that some parts of the Services may not function properly if use of cookies is refused.

A web beacon is a technology that allows identifying readers of websites and emails, e.g. for identifying whether an email has been read.

### **3.4 Web analytics services**

Although we do not normally use web analytics data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with User Data. In such situations, web analytics data can also be considered to be personal data under applicable laws, and we will treat the combined data as personal data.

Web analytics data we gather in connection with the use of our Website includes for example the following data: (i) your IP address; (ii) device and device identification number; (iii) operating system; (iv) time of visit; (v) browser type and version; (vi) language setting.

The Website uses Google Analytics, Facebook Pixel and other web analytics services to compile Analytics Data and reports on visitor usage and to help us improve the Services.

Google Analytics, is a tool developed by Google Inc., (1600 Amphitheater Parkway, Mountain View, CA 94043, USA), and used worldwide, a so-called cookie used by third parties, that

registers users' activity on the site, anonymously, that is, without identifying and without the identifiability the specific user. With Google Analytics, the Company can receive visitor information and statements that can help enhance the Company's website or services. Such data may include the number of visitors to the website; information about where, from what other website, how did the visitor arrive; which pages of the website, what order they viewed, etc. Learn more about Google Analytics cookies on this [link](#).

Facebook Pixel tool allows us to understand and deliver ads and make them more relevant to you. The collected data remains anonymous and the organiser cannot see the personal data of any individual user.

### **3.5. Subsidiary legal basis for the data controlling activity**

As a subsidiary legal basis, the legitimate interests of the Company may apply regarding the control of any of your personal data beyond the above:

- a) to contact Users and respond to User requests and enquiries;
- b) for business administration, including statistical analysis;
- c) to provide the Services to Users;
- d) for fraud prevention and detection; and
- e) to comply with applicable laws, regulations or codes of practices.

## **4. DATA TRANSFERS TO THIRD PARTIES AND TO FOREIGN COUNTRIES**

Your personal data may be transferred to the partners (sponsors) of the Event in the framework of the purposes set out above as well as for marketing purposes.

Your information may be transferred internationally especially to the data processors listed in Point 5.

When transferring information, there are strict rules in place to ensure your data is still protected to the highest standard. Where we do this, we will ensure that appropriate safeguards are put in place. Where your information is transferred outside of the European Economic Area, we will use one of the mechanisms listed below.

- Standard Contractual Clauses approved by the European Commission

## **5. RECIPIENTS**

We do not share personal data with third parties unless one of the following circumstances apply:

The registration interface for the program is provided by: Company: Junction Oy; Site: <https://app.hackjunction.com>; Seat: Fredrikinkatu 42, 00100 Helsinki, Finland; Affected personal data: Name, Age, E-mail address, Country of residence, visited educational institution, Role, Skills

Pages for communication between participants: Company: Slack Technologies Limited; Site: <https://slack.com>; Seat: 4th Floor, One Park Place, Hatch Street Upper, Dublin 2, Ireland;

Affected personal data: Name, E-mail address

Platform to organize meetings with teams between the Organizer or other parties: Company: Zoom Video Communications Inc.; Site: <https://zoom.us>; Seat: 55 Almaden Blvd, Suite 600 San Jose, CA 95113 USA; Affected personal data: Name, E-mail address

Platform to serve the ceremonies, workshops and other additional programs during the event: Company: Hopin Limited; Site: <https://hopin.com/>; Seat: 5 Bonhill Street, Shoreditch, London, England, EC2A 4BX; Affected personal data: Name, E-mail address

Newsletter service used to send information related to the ongoing program via e-mail: Company: The Rocket Science Group LLC d/b/a Mailchimp; Site: <https://mailchimp.com>; Seat: 675 Ponce de Leon Ave NE, Suite 5000 Atlanta, GA 30308 USA; Affected personal data: E-mail address

Application used to book appointments with mentors: Company: Picktime Inc.; Site: <https://www.picktime.com/> ; Affected personal data: E-mail address

## **5.1 For legal reasons**

We may share personal data with third parties outside our organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii) protect the interests, properties or safety of the Company, the Users or the public in accordance with the law. When possible, we will inform the Users about such transfer and processing.

## **5.2 To authorized service providers**

We may share personal data to authorized service providers (data processors) who perform services for us (including data storage, sales, marketing and customer support services). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy. The following data processors are used by the Company in the provision of the services:

- Facebook Pixel;
- Google Analytics;
- Google Cloud Platform;
- Mailchimp.
- Slack
- Zoom
- Picktime
- Hopin

## **6. STORAGE PERIOD**

We do not store your personal data longer than is legally permitted and necessary for the purposes of providing the Services and Event or the relevant parts thereof. The storage period depends on the nature of the information and on the purposes of processing. The maximum period may therefore vary per use.

We will store the User Data collected in connection with the registration or application process for as long as the User in question is a registered user of our Services, subscriber of our newsletters or an applicant or participant of our Event. Consequently, we will delete or permanently anonymize all the User Data within a reasonable time and at the latest after 5 years after the end of the Event, save for when we are required by law, claims handling or accounting standards or you provide your consent on a permanent basis (e.g. for marketing / information or any other permanent purposes according to the Terms and Conditions of the Event) to store some of such information in the form of personal data. In the latter case, we are entitled for the control of your respective data for an indefinite period of time required by the given purpose.

We will store Analytics Data of registered users of our Services for the duration of the registration period and thereafter for a reasonable time, but no longer than 24 months.

We will store Analytics Data of unregistered users of our Services for a reasonable time, but not longer than 24 months for the purposes specified in this Privacy Policy.

## **7. YOUR RIGHTS AS A USER**

### **7.1 Right to access**

The Users have the right to access the personal data relating to them and processed by the Company. This means that the Users may contact us, and we will inform what personal data we have collected and processed regarding the said User and communicate the purposes such data are used for, the categories, the recipients and the expected store time of such data.

### **7.2 Right to withdraw consent**

In case the processing is based on a consent granted by the User, the User may withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### **7.3 Right to rectify**

The Users have the right to have incorrect, imprecise, incomplete, outdated, or unnecessary personal data we have stored about the User corrected or completed. By contacting us on the addresses indicated above, the User may update e.g. his/her contact details or other personal data.

### **7.4 Right to deletion**

The Users may also ask us to delete the Users' personal data from our systems. We will comply with such requests unless we have a legitimate ground not to delete the data. Such legitimate ground may be based on e.g. applicable legislation.

### **7.5 Right to object**

You may have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the performance of the Services or organization of the Events or for compliance with a legal obligation. If you object to the further processing of your

personal data, this may lead to fewer possibilities to use the Services or to participate in the Events.

#### **7.6 Right to restriction of processing**

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use the Services or to participate in the Events.

#### **7.7 Right to data portability**

The Users have the right to receive their personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

#### **7.8 How to exercise your rights?**

The above rights may be exercised by sending a letter or an e-mail to us on the addresses set out above. We may request the provision of additional information necessary to confirm the identity of the User. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

### **8. DIRECT MARKETING**

We, as well as the partners (sponsors) of the Event may use your personal data for our marketing and advertising purposes, including (without limitation) by email, display media, and targeting other devices. We, as well as the partners (sponsors) of the Event do this in order to inform you about services or events we believe might be of interest to you, develop promotional or marketing materials and display event-related content and advertising on or off the Services that we believe might be of interest to you.

The User has the right to prohibit us from using the User's personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

### **9. LODGING A COMPLAINT**

The User can lodge a complaint with the local supervisory authority for data protection, in case the User considers the Company's processing of personal data to be inconsistent with the applicable data protection laws.

- Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH) ("Hungarian Data Protection and Information Freedom Authority")
- 1125 Budapest, Szilágyi Erzsébet fasor 22/C
- Telephone: 1-391-1400
- fax: 1-391-1410
- E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- website: [www.naih.hu](http://www.naih.hu)

### **10. INFORMATION SECURITY**



We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. According to the current state of techniques, these measures protect your data from illegal access, change, transfer, publication, deletion and annihilation. Only the entitled persons (e.g. the above listed data processors or our employees) shall have access to your personal data.

Should despite the security measures, a security breach occur that is likely to have negative effects to the privacy of the Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.

## **11. THIRD-PARTY WEBSITES**

The Services may contain links to and from third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We are not responsible for the privacy practices or the content on the websites of third-party sites.

## **12. OTHERS**

This Privacy Policy is published in Hungarian and in English.

Place and date: Budapest, 06<sup>th</sup> April, 2021