BÁTOR TÁBOR FOUNDATION

PRIVACY POLICY FOR CAMP PARTICIPANTS

LATEST UPDATE: 5 JULY 2022

1. GENERAL PROVISIONS AND CONTACTS

Bátor Tábor Foundation (hereinafter referred to as: "Bátor Tábor"), with regard to the applying and participating children in the camps organized by Bátor Tábor (the applicants and participants hereinafter referred to jointly as: "Camp participant"), as well as their parents, caretakers and lawful representatives (hereinafter referred to jointly as: "Lawful representative") manages information considered to be "personal data" according to article 4 point 1 of the General Regulation 2016/679 of the EU ("GDPR"). The present policy (hereinafter referred to as: "Policy") provides information about the management of such personal data. In the Policy, Camp participants and Lawful representatives shall be hereinafter referred to jointly as: "data subjects".

The registered seat of Bátor Tábor: Budapest, 1135, Reitter Ferenc utca 46-48.

The registrar of Bátor Tábor: 01-01-0008659

The phone number of Bátor Tábor: (+36 1) 302 8808 The email address of Bátor Tábor: batortabor@batortabor.hu

The website of Bátor Tábor: www.batortabor.hu

The representative and their contact email of Bátor Tábor: Erna Kindli@batortabor.hu) Data protection officer of Bátor Tábor: dr. Adrienn Esztervári (a.esztervari@batortabor.hu)

2. <u>UPDATING AND ACCESSING THE POLICY</u>

Bátor Tábor reserves the right to modify this Policy unilaterally, taking effect immediately after the modification, if necessary, with the prior information of the data subjects in time, with regard to limitations provisioned by the relevant legal regulations. The modification of the present data might take place especially in the case when it becomes necessary due to a change in legislation, a data protection authority practice, new activities resulting in the management of personal data, a newly discovered security risk, or the feedback from data subjects.

3. SPECIFIC DATA PROTECTION CONDITIONS

In case of specific data management duties, specific data protection conditions may apply, of which the data subjects are advised, for instance prior to the request of their consent to the management of their data.

4. <u>THE SCOPE OF THE DATA MANAGED AND THE PURPOSES OF DATA MANAGEMENT</u>

In case a person contacting Bátor Tábor provides not their, but other's personal data to Bátor Tábor in order to fulfil the tasks performed by the Foundation, this person is bound to care for, and is solely responsible for the observation of legal regulations, to obtain the volunteer consent of the data subject based on appropriate advise, or to provide other legal basis for the transmission of the data subject's personal data. For any damage, loss or harm due to the failure of the performance of the duties listed above, Bátor Tábor shall not be held responsible. During the management of the personal data of these third persons, Bátor Tábor will not examine the lawfulness of the transmission of the personal data of these data subjects, the validity of the data subject's consent, for these the person transmitting the personal data of the third person shall be solely held responsible.

In case a data management is necessary for the legitimate interests of Bátor Tábor or a third person, Bátor Tábor explicitly calls the attention of data subjects that the data subjects are entitled to

protest against the management of their personal data based on legitimate interest for reasons relevant to their own situation. In this case, Bátor Tábor shall not manage the data further, except for the case when they prove that data management is substituted by such coercive, legitimate reasons which have priority over the interests, rights and freedoms of the data subject, or which are related to putting forward, exercise or protect legal claims.

The scope of data managed, the objectives of data management, the duration of data management and the circle of persons having access to the data shall be presented in the following table:

Within Bátor Tábor, the following persons have basically access to the data:

Pals: who help Bátor Tábor with volunteer work.

Tábosz team: the working group organizing the application of Camp participants, keeping contact with parents and hospital contact persons.

Bátor Tábor health care team: the working group providing health care background to the camp, training and coordinating the health staff.

Program and Volunteer organization (OPS): the working group organizing and supervising programs within and outside the camp, dealing with organizing, training and coordinating volunteers.

Camp middle management (TKV): Immediate supervisor/coordinator of pals responsible for the programs or the children side of the given session. With their work they help the senior management team of the given session.

House head pals (HVC): coordinates and supports the work of pals belonging to a given children's house.

Besides the data management legal bases during the camp it may occur that data management is necessary for the following reasons:

- the management of personal data is necessary for the protection of the essential interests of the data subject or any other natural person (GDPR Article 6. (1) d)), or
- the management of health data is necessary for the protection of the essential interests of the data subject or any other natural person, in case the data subject cannot give their consent due to their lack of physical or legal capacity. (GDPR Article 9. (2) c)).

In case the duration of data preservation is provisioned as the limitation period of the Advisory requests, the act interrupting the period of data preservation shall prolong the data preservation period until the new date of the limitation period. The basis of the provision of the data preservation period is generally governed by Act V/2013 on the Civil Code (hereinafter referred to as: "Civil Code").

		The scope of data	Data preservation period, access rights, data transmission (if applicable)
During that time the treating physician of aforem the Camp participant and the Legal several representative provides the personal data of the Camp participant necessary for application to the camp. The hospital contacts of Bátor Tábor may also proposed the data subjects to contact Bátor Tábor. The data subjects to contact Bátor Tábor. The data of the Camp participant can participate in the camp conserparticipant can participate in the camp conserparticipant can participate in the camp withdress data management purposes specified in In lact the present Policy, in case data Tábor management is related to the camp health participation of the Camp participant, and and the	R Article 9 (2) a) (the data subject gave actit consent to the management of the sementioned personal data for one or all specific purposes). In regard to other personal data: GDPR cle 6. (1) a) (the volunteer consent of the subject). Id data subject is entitled to withdrawtheir tent at any time. The withdrawal of the ent does not affect the lawfulness of data agement based on consent prior to the drawal. Inck of consent, the organizers of Bátor for cannot delineate the Camp participant's the condition, what type of care they need, thus cannot decide whether the Camp to cannot decide whether the Camp to cannot can actually participate in the condition.	participant: Date and duration of the camp surname, first name, disease group, health insurance number (TAJ), EU health insurance number (EU TAJ), citizenship, place and date or birth, gender (boy/girl), mother's name Camp participant's contact details: family email address, notice by post requested, address country, zip code, city, street address, home telephone Contact details of the Campparticipant: mobile phone number, Camp participant/mother/father/other (with name) Medical data of the Camp participant: name, address of the caretaking centre, contact name and email address, mobile phone number or	Access right within the organization of Bátor Tábor: persons performing the tasks relevant to the Camp participant's application to Bátor Tábor, the health staff of Bátor Tábor and the Tábosz team. The physician, according to the relevant legal regulations governing their activities and their own data management conditions may preserve personal data and health data as an independent data manager as well.

Substantiation for participation in the camp: 1. family background (divorced parents, mosaic family, stepparent, single parent), 2. social circumstances, 3. losses and difficulties in the life of the family recently, 4. proposed for main list, waiting list and 5. other important information. Are you are of: Difficulties in adjustment to peers, following rules, relating to adults or children and behavior towards them? Extreme emotional reactions, which you think are necessary and useful to share with Bátor Tábor? Do you think it is necessary for the psychologist of Bátor Tábor, for the sake of safe participation in the camp to obtain further information?
Has the Camp participant or any member of the family participated in psychological therapy? Does the Camp participant participate in special development sessions? Has the Camp participant or any member of the family taken psychiatry drugs? If yes, what? Does the Camp participant have any psychiatric diagnosis? Any behavioral difficulties it is important to know about?

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
filled in by the Legal representative - the second phase of the Camp participant's application The parent application package can be sent by the Legal representatives following the medical application. Part of the data managed are received by Bátor Tábor already during the medical application. Bátor Tábor may use the data for other data management purposes specified in the present Policy, in case data management is related to the camp participation of the Camp participant, and these data are necessary for that.	GDPR Article 9 (2) a) (the data subject gave explicit consent to the management of the aforementioned personal data for one or several specific purposes). With regard to other personal data: GDPR Article 6. (1) a) (the volunteer consent of the data subject). The data subject is entitled to withdrawtheir consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal. The consent is necessary, because Bátor Tábor must know the data relevant to Camp participants so that they can decide about the application, realize the camp participation of the Participant, and allow the Camp participant to take part in the programs and events of Bátor Tábor, and during the camp provide for the health care of the participant, and so that the volunteers of Bátor Tábor can prepare for the participation of the Camp participant individually well.	name, year, session, place and date of birth, mother's name, address, telephone, health insurance number (TAJ), email address, illness, relative's name to be informed in case of an accident, phone number. Selecting the session: for Camp participants between 13-18 years of age suffering from cancerous and IBD disease, or undergone liver transplant / for Camp participants between 7-13 years of age suffering from cancerous and IBD disease, or undergone liver transplant / for Camp participants between 7-18 years of age suffering from diabetes, haemophilia, JIA and scoliosis Personal identification data of the Camp participant: Camp participant's name, date and place of birth, nameday, health insurance (TAJ)number, mother's name, name of the care center/hospital Camp participant's contact details: address (country, city, zip code, street, house number, floor, door), email (parent/caretaker/Legal representative, regularly checked by the family),T-shirtsize, Camp participant's mobile phone number, home phone number, mother's name and phone number, father's name and phone number of third person to be called in case of emergency	

Departure: in case of **departure by car**, who does the Camp participant leave with, what time is the Participant picked up, in case of bus and train, what time is the Participant picked up at the train/bus station. A separate declaration is needed (inform the Camp by email or phone), in case: the Camp participant does not arrive or leave with a dedicated family member, or (in case of a teenage Camp participant) the Camp participant is allowed to leave the camp alone. Health data of the Camp participant: food allergy, drug allergy, other allergy (e.g. insect bites), special diet (milk protein, lactose, gluten free, vegetarian and diabetic diet), do they use insulin pump (to be filled in in case of diabetes) (Y/N), type of the insulin pump, present daily insulin dosage scheme (to be filled in in case of diabetes) (breakfast, morning snack, lunch, afternoon snack, dinner, post-dinner snack), present daily diet scheme (to be filled in in case of diabetes) (breakfast, morning snack, lunch, afternoon snack, dinner, post-dinner snack). Is assistance necessary in the following? (toothbrushing/dressing up/bathing/eating/toilet use, etc.), does the Camp participant use/need any specialaidsfor their everydayactivities?(wheelchair, walking stick, back brace, lift, etc.)

The objective of data management	The legal basis of data management		Data preservation period, access rights, data transmission (if applicable)
		Has it ever happened that the Camp participant was assisted by a psychologist or participated in psychiatric care? (1. yes, the doctor prescribed a psychiatry drug for the Camp participant for the following reason, the type of the drug is, 2. yes, during the hospital stay a psychologist was consulted for the following reason, 3. yes, the Camp participant goes to individual/family therapy for the following reason, 4. it has not occurred, 5. other)	
		Has any important change happened recently in the family? (1. divorce 2. moving 3. change of kindergarten/school, 4. serious disease of a close relative/an important person for the Camp participant, 5. death of a close relative/an important person for the Camp participant, 6. birth of a sibling/a new family member (e.g. partner) moved into the family home 7. longer hospital stay/isolation from the usual surroundings, 8. there has been no important changes in the family recently) - if yes, please, expand.	
		Is there any essential information relevant to the camp to know about the Camp participant? E.g. how they behave in the company of other children, how they relate to adults and rules, how they can be calmed down when they get upset or scared of something?	
		In case of SCOLIOSIS: What is the Camp participant's biggest physical/mental difficulty concerning brace? What is the Camp participant's biggest physical/mental difficulty as a child after spine operation? Has the Camp participant met a child with chickenpox within one month before the camp?	

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
		The Camp participant's letter to future pals: surname, first name, nickname, date of birth, nameday, in my spare time I like to to this, my favorite stories, films, my favorite singers/bands, 4 things that characterize me the most, it occurs I am scared of something, if I had three wishes concerning the camp, have you ever been to Bátor Tábor (Y/N), my message to the pals is Message board: drawing, message Summary of the data given: General data of the Camp participant: name, date of birth, disease group, father's name, phone number, mother's name, phone number, home phone number, third person's name, phone number, email address, health insurance (TAJ) number. Camp participant's application, camp and health information: treatment center, treating physician's name, contact name, diagnosis and its date, anamnesis, accompanying illnesses, drug sensitivity, diet, allergy, movement specifics, central catheter, prosthesis. PCDAI, PUCAI, IBD special needs, treatment care, therapeutic aid, difficulty, any other essential information. Camp participant's other data: relative's place and date of birth, ID card number.	

The objective of data management	The legal basis of data management		Data preservation period, access rights, data transmission (if applicable)
the Camp participant, the staff of Bátc Tábor can prepare for the safe cam participation of the Participant (e.g.	PWith regard to other personal data: GDPR	camp information, Disease group, center, treating physician, coordinator, diagnosis and its date, anamnesis, accompanying illnesses, drug sensitivity, diet, allergy, movement, central catheter, prosthesis, PCDAI, PUCAI, IBD special needs, camp participation recommendation, special treatment, special care, special therapeutic aid, special difficulty, any other essential information, comment, nameday.	

	Data preservation time: in the lack of the withdrawal of the data subject's consent, 5 years following the relevant camp participation (based on paragraph §(1) of 6:22 of the Civil Code, any claims regarding the Camp participant's travel reach a statute of limitations in 5 years).
	Access right within the organization of Bátor Tábor: Tábosz team, Program and Volunteer organization (OPS).
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The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data
·			transmission (if applicable)
of the Camp participant. The aim of the recording of the data is to ensure that the Camp participant only travels accompanied by a person legally entitled by the Legal representative on the declaration form.	GDPR Article 9 (2) a) (the data subject gave explicit consent to the management of the aforementioned personal data for one or several specific purposes). With regard to other personal data: GDPR Article 6. (1) a) (the volunteer consent of the data subject). The data subject is entitled to withdrawtheir consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal. In the lack of consent, Bátor Tábor cannot ensure that the Camp participant only travels accompanied by a person legally entitled by the Legal representative on the declaration form.	Declaration for leaving the camp: the Camp participant's name, the Camp participant's date and place of birth, relative's name, place and date of birth, ID card number, signature, date (hour, minute), in case not the Legal representative/relative delivers/takes over the Camp participant, the name, ID card number, address, declaration that the Camp participant was taken over by a volunteer to travel to the campsite are	

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
Recording of the data relevant to checking in and out of the Camp	With regard to health care data: GDPR Article 9 (2) a) (the data subject gave explicit consent to the management of the aforementioned personal data for one or several specific purposes).	other information on the arrival, means of transport, other information on the departure, address (city, zip code, address), father's name, father's phone number, mother's name, mother's phone number, home phone number, third person's name, email address, parent's application package, Bátor Codex, traveling costs, comments.	Data preservation time: in the lack of the withdrawal of the data subject's consent, 5 years following checking in and out of the camp (based on paragraph §(1) of 6:22 of the Civil Code, any claims regarding application to the camp reach a statute of limitations in 5 years). Access right within the organization of Bátor Tábor: Tábosz team, Program and Volunteer organization (OPS), Bátor Tábor health staff

The objective of data management	o o		Data preservation period, access rights, data transmission (if applicable)
Preparing videos, photos, interviews and other media material with regard to the camp, in whichthe Camp participant or the Legal representative can be present. Through videos, photos taken, interviews made about the camp, Bátor Tábor documents and presents for outsiders its activities, so that they can raise funds for their operations. Bátor Tábor, and any third person commissioned by them can use these	GDPR Article 9 (2) a) (the data subject gave explicit consent to the management of the aforementioned personal data for one or several specific purposes). With regard to other personal data: GDPR Article 6. (1) a) (the volunteer consent of the data subject). The data subject is entitled to withdrawtheir consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal. In the lack of consent by the data subject, the media materials cannot be prepared.	camp and other media materials.	Data preservation period: On the data subject's request the media material can be deleted at any time. The right to withdrawal in case of media materials already released for the public can fully be exercised until the publication of such materials. Third persons can save or make copies of the materials published from a website or a social media platform, Bátor Tábor cannot control that. Access right within the organization of Bátor Tábor: Until the publication of the recorded material: the Bátor Tábor Foundation staff. Records of the data subject with regard to public event activities, and in case of mass recordings, the data subject's consent is not needed for the preparation and the usage of the records (Civil Code 2:48. §). Bátor Tábor does not forward personal data of the Camp participants to SeriousFun Children's Network besides media materials.
The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)

Health shoots filled in demine the come With record to health come date.	The Commence to impose 2 DIAD sheets a set in-	Data
Health sheets filled in during the camp. With regard to health care data:		Data preservation time: in the lack of the
The aim of keeping records on the health GDPR Article 9 (2) a) (the data subject gav		withdrawal of the data subject's consent, 5 years
sheets is to guarantee that the Camp explicit consent to the management of th		following the participation
participant's health data are the latestaforementioned personal data for one of	r	at the camp, or the relevant camp participation
possible at the start of the camp, thus several specific purposes).	The Camp participant's drug sheet: contains	(based on paragraph §(1) of 6:22 of the Civil
ensuring the	pharmaceuticals given during the camp.	Code, any claims regarding application to the
Camp participant's safe participation in With regard to other personal data: GDPl		camp
	The Camp participant's health sheet: contains	
data subject).	the records of any treatment given, necessary	,
	during the camp	Access right within the organization of Bátor
The data subject is entitled to withdraw		Tábor: the health staff of Bátor Tábor
their consent at any time. The withdrawal of	fThe Camp participant's records: faeces test	
the consent does not affect the lawfulness of		
data management based on consent prior t		
	The Camp participant's discharge report	
the withdrawal.	The Camp participant's discharge report	
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In lack of consent, Bátor Tábor canno		
guarantee that the Camp participant's healt	1	
data are the latest		
possible at the start of the camp,		
thus ensuring the Camp participant's saf	e	
participation in the camp.		
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Records of accidents and unexpected With regard to health care data: GDPR Accident report: the injured person's name, Data preservation time: 5 years following the hazardous events during the camp. Article 9. (2) h) (data management for health address, permanent staff/volunteer/Camp)participation at the camp (based on paragraph prevention purposes, necessary to provide participant, date and exact time, how the accident \$(1)\$ of 6.22 of the Civil Code, any claims health care or treatment), and according to health care or treatment), and according to health care or treatment of health data is injuries, name of the witness(es), name of first aidstatute of limitations in 5 years). responders, their position, what emergency interests of the data subject or any other interventions took place, the cause of the accident Access right within the organization of Báto natural person, in case the data subject cannot (according to the first aid responder), was management of Bátor Tábor, give their consent due to their lack of physical or legal capacity; With regard to other personal data: GDPR 6. article (1) f) (legitimate interest of Bátor Tábor; the documenting accidents and unexpected participation in the camp in the participation in the camp in the participation of the camp, to guarantee safe (yN), was the reason for the documenting accidents and unexpected participation in the camp in general (in this table to be at the given location (YN), was protective clothing available at the given program participation in the camp in general (in this table to be at the given program participation in the camp in general (in this table to be at the given program participation in the camp in general (in this table to be at the given program participation in the camp in general (in this table to be at the given program participation in the camp in general (in this table to be at the given program participation in the camp in general (in this table table to the program participation in the camp in general (in this table table table t	The objective of data management	The legal basis of data management		Data preservation period, access rights, data transmission (if applicable)
prevention purposes, necessary to provide participant, date and exact time, how the accidents (1) of 6:22 of the Civil Code, any claims health care or treatment), and according to happened, who were present, details of theregarding participation in the camp reach a clause c) the management of health data is incressary for the protection of the essential interests of the data subject or any other natural person, in case the data subject cannot give their consent due to their lack of physical or legal capacity); With regard to other personal data: GDPR 6. article (1) f) (legitimate interest of Bátor Tábor). The legitimate interest of Bátor Tábor Tábor hazardous situations, to reveal responsibility (YN), can they continue their work/participation and find the root causes, to improve the participation of the Camp participant anonymous), and during the participant of the camp to grant solution of the Stuation, names of the persons concerned, action plan (persons responsible), what emergency measures were taken to tackle the	Records of accidents and unexpected	With regard to health care data: GDPR	Accident report: the injured person's name,	Data preservation time: 5 years following the
health care or treatment), and according to happened, who were present, details of the regarding participation in the camp reach a clause c) the management of health data is injuries, name of the winters(es), name of first aid statute of limitations in 5 years). necessary for the protection of the essential responders, their position, what emergency interests of the data subject or any other natural person, in case the data subject cannot (according to the injured person, according to the Tabor: do their lack of physical winterventions took place, the cause of the accident Tabor; determine the health staff of Bátor Tábor, give their consent due to their lack of physical winterventions took place, the cause of the accident Tabor: do the injured person, according to the Tabor: do the first aid statute of limitations in 5 years). Access right within the organization of Bátor Tábor: do the protective forms and responsible ty (N/N), to whom, when, if not immediately, what was the reason for the accident reported (Y/N), to whom, when, if not immediately, what was the reason for the accident reported (Y/N), did they follow the safety regulations (Y/N), was protective clothing available at the given program location (Y/N), was the person wearing the documenting accidents and unexpected protective clothing available at the given program location (Y/N), can they continue their work/participation and find the root causes, to improve the in the camp (if yes, from when?) conditions of the camp, to guarantee safe (Y/N), recommendation (e.g. performing easier participation in the camp participant. The legitimate interest of Bátor Tábor: do the time of the event (if necessary), brief description of the situation, names of the persons concerned, action plan (persons responsible), what emergency measures were taken to tackle the			address, permanent staff/volunteer/Camp	participation at the camp (based on paragraph
problem, possible reasons which could cause the emergency, was the emergency reported immediately (Y/N), if yes, to whom, if not immediately, when was it reported and what was the reason for the delay, following the establishment of the strategic plan how was the emergency managed, what was the result, communication strategy, recommendation to prevent similar incidents in the future, filled in by	hazardous events during the camp.	Article 9. (2) h) (data management for health prevention purposes, necessary to provide health care or treatment), and according to clause c) the management of health data is necessary for the protection of the essential interests of the data subject or any other natural person, in case the data subject cannot give their consent due to their lack of physical or legal capacity); With regard to other personal data: GDPR 6. article (1) f) (legitimate interest of Bátor Tábor: documenting accidents and unexpected nazardous situations, to reveal responsibility and find the root causes, to improve the conditions of the camp, to guarantee safe participation in the camp in general (in this case by making the data of the Camp participant anonymous), and during the participation of the Camp participant.	address, permanent staff/volunteer/Camp participant, date and exact time, how the accident happened, who were present, details of the injuries, name of the witness(es), name of first aid responders, their position, what emergency interventions took place, the cause of the accident (according to the injured person, according to the witness, according to the first aid responder), was the accident reported (Y/N), to whom, when, if not immediately, what was the reason for the delay (its date and time), the injured person was supposed to be at the given location(Y/N), did they follow the safety regulations (Y/N), was protective clothing available at the given program location (Y/N), was the person wearing the protective clothing during the given program (Y/N), can they continue their work/participation in the camp (if yes, from when?) (Y/N),recommendation (e.g. performing easier tasks, rest time, etc.), **Unexpected hazardous situation:* date and exact time of the event (if necessary), brief description of the situation, names of the persons concerned, action plan (persons responsible), what emergency measures were taken to tackle the problem, possible reasons which could cause the emergency, was the emergency reported immediately (Y/N), if yes, to whom, if not immediately, when was it reported and what was the reason for the delay, following the establishment of the strategic plan how was the emergency managed, what was the result, communication strategy, recommendation to	participation at the camp (based on paragraph §(1) of 6:22 of the Civil Code, any claims regarding participation in the camp reach a statute of limitations in 5 years). Access right within the organization of Bátor Tábor: the health staff of Bátor Tábor, management of Bátor Tábor

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
member. The aim of the profile is to provide Bátor Tábor with information by the end of the camp how the Camp participant related to the conditions in the camp and the emerging difficulties. Bátor Tábor uses this information and experiences to improve the conditions of the camp, to guarantee safe participation in the camp in general (in this case by making the data of	GDPR Article 9 (2) a) (the data subject gave explicit consent to the management of the aforementioned personal data for one or several specific purposes). With regard to other personal data: GDPR Article 6. (1) a) (the volunteer consent of the data subject). The data subject is entitled to withdrawtheir consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal. In the lack of consent, Bátor Tábor cannot be informed about how the Camp participant related to the conditions in the camp and the emerging difficulties, and cannot use these information and experiences to improve the conditions of the camp.	Year, session, Camp participant's name, HVC full name, home pals' full name Was homesickness stronger than average or that of the peers? (1. never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers. 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	Access right within the organization of Bátor Tábor: Tábosz team, Program and Volunteer organization (OPS)

The objective of data management	The legal basis of data management		Data preservation period, access rights, data transmission (if applicable)
		In order to solve conflicts, did the Camp participant ask for help from pals / did the Camp participant bully others? (1. never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers, 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	
		Has it occurred that the Camp participant is slower than their peers in movement/dressing/maintaining personal hygiene/needed more rest? (1. never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers, 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	
		Has it ever occurred that the Camp participant became a victim of bullying? (1. never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers, 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	
		Has it ever occurred that the Camp participant behaved aggressively towards peers/pals? (1. never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers, 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
		Has it ever occurred that the Camp participant followed the instructions of pals/camp regulations with difficulty? (1. never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers, 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	
		Has the Camp participant needed more effort for motivation compared to peers? (1 never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers, 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	
		In relating to their peers, has the Camp participant needed more support/was the Camp participant prone to be extroverted/separated from peers? (1. never/rarely occurred, 2. often occurred but it was not a challenge, 3. often occurred and it was a challenge for pals or peers, 4. have you experienced development or change during the camp, 5. what strategy helped in tackling challenging situations)?	
		What skills has the Camp participant gained during the camp, how did they fit in with peers, what characterized their peer relationships, other behavior which might be important for pals?	
		Has the Camp participant any outstanding talent? E.g. singing, reciting poems, sports, dance, other,	

The objective of data management	The legal basis of data management		Data preservation period, access rights, data transmission (if applicable)
		Would you recommend the Camp participant to participate in media coverage or at any event? (TV live show, TV documentary - after editing / radio interview / written interview / I do not recommend it, if yes, why? e.g. communicated confidently/expressed deep thoughts/smiled a lot/other	
		If you have met the parents, could you imagine them in an interview? (I have not met	
Participation in the Bátor Alumni program, and recording data relevant to this. Bátor Alumni was established by Bátor Tábor so that Camp participants can be updated about the life of Bátor Tábor, its events and gatherings. The aim of the Alumni program is to maintain the community of Bátor Tábor after the camp.	participant's consent	address.	On the Camp participant's request the data can be deleted at any time (until withdrawal). Access right within the organization of Bátor Tábor: Tábosz,marketingteam, development team, OPS, Bátor Tábor management
	GDPR Article 6. (1) a) (the data subject's consent The data subject is entitled to withdrawtheir consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal. In the lack of consent from the data subject Bátor Tábor cannot contact the Camp participant/Legal representative whether they are willing to contribute publicly to any charity event, press event in the future.	address	On the data subject's request the data can be deleted at any time (until withdrawal). Access right within the organization of Bátor Tábor: Tábosz, marketing team, development team, OPS, Bátor Tábor management

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
participant / Legal representative for	consent	The Camp participant's name, email address, address	On the data subject's request the data can be deleted at any time (until withdrawal).
the purposes of research, e.g. survey			
Tábor.	The data subject is entitled to withdrawtheir consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.		Access right within the organization of Bátor Tábor: Tábosz,marketingteam, development team, OPS, Bátor Tábor management
	In the lack of consent from the data subject Bátor Tábor cannot contact the Camp participant/Legal representative for research purposes.		
Application to the SuliProgram (School			Data preservation period: following the session
	GDPR Article 9 (2) a) (the data subject gave		personal data are deleted without unsubstantiated
	explicit consent to the management of the		delay, except for the name, disease group, school,
	aforementioned personal data for one or several specific purposes)		class, contact of the parent or the Legal representative of the ill child participating in the School Program, in case the parent or the Legal representative agrees that they are invited to other programs organized by Bátor Tábor.
The data of the ill child participating in the	With regard to other personal data: GDPR		
School Program are delivered to Bátor	Article 6. (1) a) (the volunteer consent of the		
Tábor by the parent or the legal representative during a telephone interview.			Access right within the organization of Bátor Tábor: staff involved in the organization of the Opsz School Program
subject themselves, or with the data subject's consent the form master provides	consent does not affect the lawfulness of data management based on consent prior to the	Personal data of the ill child participating in the School Program: name, class Medical data of the ill child participating in the School Program: disease group, data relevant to	
		treatment	

The objective of data management	The legal basis of data management		Data preservation period, access rights, data transmission (if applicable)
Personal data of the of the form master is provided by the data subject themselves or with the data subject's consent theis uperior, the school principal provides it to Bátor Tábor.	School Program cannot evaluate the health condition of the ill child participating in the school program, and needs relevant to the resessions.	Other personal data of the ill child participating in the School Program provided during the parent interview: the ill child's name, birth year, school, class, disease group and other information (e.g. is the child still receiving treatment, and if yes, how often, is the child still absent from school, how long was the child absent from class, did the child return to the same class, what can the others know about the disease and from whom, and other information shared by the parent about the child (e.g. how they get along with others, the disease, and in general what the parent considers important to tell about the child and is necessary to know for the sake of the sessions) Personal data of the Parent or other Legal representative of the ill child participating in the School program: name, email address, other contact (phone number) Personal data of the form master: name, email	

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, data transmission (if applicable)
Specific data management relevant to application to the Lélekmadár Tábor (Soulbird Camp). In case a parent or a grandparent would join our grief camp, they would basically fill in the application form for Camp participants, however we need further specific information from them.	GDPR Article 9 (2) a) (the data subject gave explicit consent to the management of the aforementioned personal data for one or several specific purposes). With regard to other personal data: GDPR Article 6. (1) a) (the volunteer consent of the data subject). The data subject is entitled to withdrawtheir consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the	What illness did the child die of? How long was the child ill? Is there any information you would like to share briefly about the period of the disease? Did the whole family go to the funeral? Was there anybody who stayed away? Did you use the opportunity of grief counselling? Has any bigger change occur in the life of the family during the past year? Who is affected in	Data preservation time: in the lack of the withdrawal of the data subject's consent, 5 years following the application, or the relevant camp participation (based on paragraph §(1) of 6:22 of the Civil Code, any claims regarding application to the camp reach a statute of limitations in 5 years). Access right within the organization of Bátor Tábor: persons performing
	In lack of consent, Bátor Tábor cannot decide about the application to the Lélekmadár Tábor camp, and cannot provide grief counselling in the camp.	•	

5. DATA FORWARDING

For the performance of tasks related to data management activities, Bátor Tábor uses the following contractual partners. The contractual partner proceeds as a so-called "data processor", manages the data specified in the present Policy in the name of Bátor Tábor.

Bátor Tábor can only use such data processors who provide appropriate guarantees - with special regard to expertise, reliability and capacities, so that they perform the technical and organizational measures ensuring the fulfillment of GDPR requirements, including the security of data management. Specific tasks and responsibilities of the data processor are governed by the contract concluded between Bátor Tábor and the data processor. Following the performance of the data management in the name of Bátor Tábor the data manager, according to the choice of Bátor Tábor returns or deletes personal data, except for the case when an EU or member state law relevant to the data processor stipulates their storage.

The data processor	Activity
Mrs Katalin Kardos Horváth Address: 1135 Budapest, Reitter Ferenc utca 46-48. Phone number: +36 06 1 302 88 08 E-mail address: k.kardos@batortabor.hu	Mrs Katalin Kardos Horváth is the dietician of Bátor Tábor: she receives data relevant to the diseases and food allergies of the Camp participants so that the safe meals for Camp participants can be guaranteed during the camp.
Angelika Szabó Address: 1135 Budapest, Reitter Ferenc utca 46-48. Phone number: +36 06 1 302 8808 E-mail address: a.szabo@batortabor.hu	Angelika Szabó is member of the health staff of Bátor Tábor, she receives the data of Camp participants so that she can provide appropriate medical background for Camp participants during the session.
Anna Dorka Kocsis Address: 1135 Budapest, Reitter Ferenc utca 46-48. Phone number: +36 20 278 4316 E-mail address: d.kocsis@batortabor.hu	Anna Dorka Kocsis is the psychologist of Bátor Tábor. In case she would like to receive more information about the Camp participant based on the information given in the parent application package, she can contact the parents.
Miklós Vicsek - Enterprise Soft. Kft. Address: 1024 Budapest, Harcsa utca 2 Phone number: +36 30 286 59 7 E-mail address: info@enterprisesoft.hu	Miklós Vicsek is responsible for the maintenance and development of the database containing Camp participants' data.
Infosector Kft. Address: 1117 Budapest, Fehérvári út 50-52. Phone number: +36 1 800 8115 E-mail address: hello@infosector.hu	The system administrator of Bátor Tábor. During his activities, he has access to the data managed by Bátor Tábor.

6. DATA SAFETY MEASURES

Bátor Tábor keeps printed materials containing personal data of Camp participants in a locked cabinet. Access to online stored data is limited within the organization, it is protected by password and only those teams work with the data for the work of whom it is absolutely necessary. The internal network is protected against external attacks by a firewall.

7. RIGHTS AND LEGAL REMEDIES OF THE DATA SUBJECT

7.1 Data protection rights and legal remedies

Data protection rights and legal remedies of data subjects are contained by the relevant GDPR provisions in detail (with special regard to articles 15., 16., 17., 18., 19., 20., 21., 22., 77., 78., 79., 80. and 82. of the GDPR). The following summary contains the most important provisions, and Bátor Tábor provides information to data subjects about their rights and legal remedies relevant to data management accordingly.

Bátor Tábor informs the data subject about measures following their request without unsubstantiated delay, but in any event within one month following the data subject's request relevant to the exercise of their rights (see: articles 15-22. of the GDPR). If necessary, taking into consideration the complexity of the request and the number of requests, the deadline can be postponed by another two months. Bátor Tábor shall inform the data subject about the postponement of the deadline by stipulating the reasons of the delay within one month from the receipt of the request.

Information shall be given in writing or in another manner, including, but not limited to electronically. An oral information can also be given to the data subject's request, in case the identity of the data subject was verified otherwise. In case the data subject submitted their request electronically, if possible, the information shall be given electronically, unless the data subject requests otherwise.

In case Bátor Tábor does not take measures following the data subject's request, they shall inform the data subject without delay, but within one month from the receipt of the request the latest about the reasons of the failure of taking measures and that the data subject can submit a complaint at a supervisory authority and may seek legal remedy in court.

7.2 The data subject's access rights

- (1) The data subject has the right to receive feedback from Bátor Tábor regarding the fact whether the procession of their personal data is in progress. In case such data processing in progress, the data subject is entitled to have access to their personal data and the following information:
 - a) the objectives of data management;
 - b) categories of the personal data concerned;
 - c) categories of the recipient(s) to whom Bátor Tábor has disclosed or will disclose personal data, with special regard to third country recipients, and international organizations;
 - d) if relevant, the planned duration of the storage of the personal data, or if it is not possible, the conditions of stipulating such a period;
 - e) the right of the data subject that they can request Bátor Tábor to amend, delete or restrict the management of their data, and protest against the management of such personal data;
 - f) the right to submit a complaint to a supervisory authority; and
 - g) if the data was not collected about the data subject, any available information regarding their source;
 - h) the fact of automated decision-making (GDPR Article 22 (1) and (4)), including profiling, and at least in these cases conspicuous information about the logic applied and what significance such data management has, and what consequences it may have on the data subject.
- (2) In case personal data are forwarded to a third country, the data subject has the right to receive

information about the appropriate guarantees regarding forwarding.

(3) The copy of the personal data constituting the subject of data management is made available to the data subject by Bátor Tábor. For any further copies requested by the data subject Bátor Tábor may charge a reasonable fee, based on the administrative costs. In case the data subject submitted their request electronically, the information shall be given to them in a widely used electronical format, unless the data subject requests otherwise.

7.3 The right to rectification

The data subject shall have the right that Bátor Tábor on their request rectifies the inaccurate personal data concerning them without delay. The data subject is entitled to request the completion of incomplete personal data, among others, via supplementary declaration.

7.4 Right to erasure ("right to be forgotten")

- (1) The data subject has the right that on their request Bátor Tábor erases their personal data without unsubstantiated delay in case of one of the following reasons:
 - a) the personal data are not need anymore for the purpose they were collected or managed in any other manner by Bátor Tábor;
 - b) the data subject withdraws their consent constituting the basis of data management, and the data management has no other legal basis;
 - c) the data subject protests against the management of their data and in the given case there is no legal reason for data management with priority;
 - d) personal data were managed unlawfully;
 - e) the personal data shall be erased by Bátor Tábor to perform a legal requirement of the EU or a member state; or
 - f) the collection of personal data was related to the offer of services relevant to the information society.
- (2) In case Bátor Tábor disclosed the personal information, and is obliged to erase them in accordance with the aforementioned facts, by taking into consideration accessible technology and the costs of feasibility, shall take the reasonably expectable measures, including technical measures, so that they inform data managers managing the data that the data subject has initiated the erasure of the links to the relevant personal data or the copy of such personal data and any copies.
- (3) Paragraph (1) and (2) are not to be applied, in case data management is necessary, among others:
 - a) to exercise the right of freedom of speech and access to information;
 - b) to perform a legal requirement of the EU or a member state applicable to Bátor Tábor provisioning the management of personal data;
 - c) for archiving for the sake of public interest, scientific or historical research purposes or statistical purposes, in case the right mentioned in paragraph (1) would possibly render data management impossible or risk it substaintially; or
 - d) to establish, exercise or defend legal claims.

7.5 The right to the restriction of data management

- (1) The data subject has the right that on their request Bátor Tábor erases their personal data without unsubstantiated delay in case of one of the following reasons:
 - a) the data subject debates the accuracy of the personal data, and in this case the restriction concerns the period which allows Bátor Tábor to check the accuracy of the personal data;
 - b) data management is unlawful, and the data subject opposes the erasure of personal data, and instead requests the restriction of their use;
 - c) Bátor Tábor does not need the personal data anymore for data management, however the data subject needs them to put forward, exercise or protect legal claims; or
 - d) the data subject protested against data management; in this case restriction concerns the period until it is found whether the legitimate interests of Bátor Tábor have priority over the

legitimate interests of the data subject.

- (2) In case data management, due to paragraph (1) is subject to restriction, such personal data, except for storage can be managed only with the data subject's consent, or to forward, exercise or protect legal claims, or to protect the rights of another natural or legal person, or for the important public interest of the EU or any member state.
- (3) Bátor Tábor informs the data subject on the request of whom data management was restricted about the lifting of the restriction in advance.

7.6 Obligation of information for the correction or erasure of the personal data, and for the restriction of data management

Bátor Tábor shall inform every addressee about all the corrections, erasures or data management restrictions to whom or which they disclosed the personal data, except in case it is rendered impossible, or needs disproportionately huge effort. The data subject, on their request are informed about these addressees.

7.7 Right to data portability

- (1) The data subject has the right to receive the personal data concerning them, disclosed to Bátor Tábor in a structured, generally used, machine-readable format, and also has the right to forward these data to another data manager without Bátor Tábor hindering it, in case:
 - a) the data management is based on consent or contract; and
 - b) the data management is done in an automatized manner.
- (2) Exercising the right to the portability of data in accordance with paragraph (1) the data subject has the right to request, if it is technically feasible, the direct forwarding of the personal data between data managers (thus Bátor Tábor and other data manager).
- (3) Practicing the aforementioned rights cannot infringe the provisions regarding the right to erasure ("right to be forgotten"), and this right cannot affect adversely the rights and freedoms of others.

7.8 Right to protest

- (1) The data subject has the right that for reasons relevant to their situation they protest against the management of their personal data based on legitimate interest at any time, including profiling. In this case, Bátor Tábor shall not manage the data further, except for the case when they prove that data management is substituted by such coercive, legitimate reasons which have priority over the interests, rights and freedoms of the data subject, or which are related to putting forward, exercise or protect legal claims.
- (2) In case the management of personal data is performed for direct marketing, the data subject has the right to protest at any time against the management of the data subject's personal data for this purpose, including profiling, when it is connected to direct marketing.
- (3) In case the data subject protests against the management of personal data for direct marketing, then the personal data cannot be managed further for this purpose.
- (4) With regard to the use of services related to the information society, and deriving from the 2002/58/EC directive, the data subject can exercise their right to protest with the help of automated tools based on technical requirements.
- (5) In case the management of personal data is performed for the objective of scientific or historic research, the data subject has the right to protest for reasons relevant to their own situation against the management of the data subject's personal data, except for the case when the data management is necessary for the performance of a task for the public interest.

7.9 Right to make a complaint at the supervisory authority

The data subject has the right to make a complaint at a supervisory authority, especially in the member state according to their usual residence, workplace, or the supposed infringement of rights, in case the data subject considers the management of personal data of the data subject infringes the provisions of the GDPR. In Hungary, the authority responsible is the following: Hungarian National Authority for Data Protection and Freedom of Information (website: http://naih.hu/; address: 1055 Budapest Falk Miksa utca 9-11.; postal address: 1530 Budapest, Pf.: 5.; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu).

7.10 Right to effective court remedy against the supervisory authority

- (1) The data subject is entitled to effective court remedy against the supervisory authority's legally binding decision relevant to the data subject.
- (2) The data subject is entitled to effective court remedy in case the supervisory authority in charge does not deal with the complaint, or does not inform the data subject within three months about the developments or results of the procedure concerning the submitted complaint.
- (3) Proceedings against the supervisory authority shall be initiated at the court in the member state according to the registered seat of the supervisory authority.

7.11 Right to effective court remedy against Bátor Tábor or the data processor

- (1) The data subject is entitled to effective court legal remedy without hte infringement of the administrative or non-court legal remedies available, including the right to complaint at the supervisory authority, in case they have the opinion their rights according to the GDPR were infringed as their personal data were not managed in accordance with the GDPR.
- (2) Proceedings against Bátor Tábor or the data processor shall be initiated at the court of the member state according to the location of the Employer or the place of activity of the data processor. Such proceedings can also be started at a court in the member state according to the usual residence of the data subject. For information about the competent court and its contacts please visit the following website: www.birosag.hu.

I have acknowledged the information in the Policy above, and I have received one copy of the Policy. Hereby I confirm that I had the opportunity to ask questions, to which I received appropriate information.

,201[*]

Signature:

Name (in capital letters):

(In case of a Legal representative) scope, address, place and date of birth: