

BÁTOR TÁBOR FOUNDATION

PRIVACY POLICY FOR VOLUNTEERS

LATEST UPDATE: 5 JULY 2022

1. GENERAL PROVISIONS AND CONTACTS

Bátor Tábor Foundation (hereinafter referred to as: “**Bátor Tábor**”), with regard to its volunteers applying for the camp and volunteers participating in the camp (hereinafter referred to jointly as: “**Volunteer**”) 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.

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(e.kindli@batortabor.hu)

Data protection officer of Bátor Tábor: dr. Adrienn Esztervári (a.esztervari@batortabor.hu)

2. UPDATING AND ACCESSING THE POLICY

Bátor Tábor reserves the right to modify this Policy unilaterally, taking effect immediately after the modification, with regard to limitations provisioned by the relevant legal regulations, and if necessary, with the prior information of the Volunteers in time. 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 Volunteers.

3. SPECIFIC DATA PROTECTION CONDITIONS

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

Bátor Tábor proposes the Volunteers to read the privacy policy made for camp participants by Bátor Tábor (available here:

<https://batortabor.hu/dokumentumtar/adatvedelem>), because during the management of the personal data of camp participants (e.g. when the camp participants are profiled) the personal data of Volunteers may also be included (e.g. when events in the camp are described).

4. THE SCOPE OF THE DATA MANAGED AND THE PURPOSES OF DATA MANAGEMENT

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 Volunteers that the Volunteers 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 Volunteers, 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 in volunteer work (including experts; Camp middle management (KV), who are the superiors/coordinators of the pals of a given session responsible for programs or children; the house leading pals (HVC) who coordinate and support the work of pals of a given children's house; program executing pals (PT) and GO! coordinators);
- 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.
- Financial team (with regard to data on the contracts of contracted experts, Kvs, GO! coordinators);
- Fundraising team.

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.

Legislation referred to in the table:

- Act V/2013 on the Civil Code (hereinafter referred to as: “**Civil Code**”)
- Act LXXXVIII/2013 on volunteer activities for public interest (hereinafter referred to as: “**Act on volunteers**”)

Budapest-1310687.1

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, recipients of data transfers
<p>Application to Bátor Tábor on the application platforms of Bátor Tábor</p> <p>During the process, the Volunteer usually provides the data necessary for the application to the programs of Bátor Tábor following registration on the application platforms of Bátor Tábor.</p> <p>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 Volunteers, and these data are necessary for that.</p>	<p>With regard to health care data: (in case the Volunteer provides such information in their CV): GDPR Article 9 (2) a) (the Volunteer gave explicit consent to the management of the aforementioned personal data for one or several specific purposes), and GDPR Article 9 (2) a) (data management is performed within the framework of the legitimate activities of Bátor Tábor as a nonprofit foundation).</p> <p>With regard to other personal data: GDPR Article 6. (1) a) (the consent of the Volunteer).</p> <p>The Volunteer is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In lack of consent, Bátor Tábor cannot decide on the application of the Volunteer and select them to participate in a given session and/or program.</p>	<p>The Bátor Tábor user data of the Volunteer: full name, date of birth, nameday, gender, address or residential address, mother's name, mobile phone number, email address, name of the school (in case the Volunteer is a student) and its address, highest school achievement, health insurance (TAJ) number, name of the workplace (if applicable) and its address, photo, user name, email address, password, date of registering the account, skype name.</p> <p>The Volunteer's user data:</p> <p>Written recommendation about the Volunteer (the recommendation template can be downloaded from the Bátor Tábor website: https://batortabor.hu/dokumentumtar/referencia/)</p> <p>The Volunteer's CV:</p> <p>The interviews of the Volunteers are evaluated, which helps Bátor Tábor staff to assess the competences necessary for volunteering in the camp. Important factors are communication skills, problem-solving skills, and responding to certain situations.</p>	<p>Data preservation time: in the lack of the withdrawal of the data subject's consent, 5 years following the termination of the contact with the Volunteer (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).</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization (OPS), Health office team, Database operator IT expert, IT system administrator, Office head, Management</p>

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<p>Management of data of Volunteers put on the waiting list</p> <p>The aim of the waiting list is to fill in the post of a volunteer when a Volunteer position is vacated from the Volunteers on the waiting list.</p>	<p>GDPR Article 6. (1) a) (the consent of the Volunteer).</p> <p>The Volunteer is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In lack of consent, Bátor Tábor cannot call in the Volunteer on the waiting list to the vacant position.</p>	<p>The Volunteer's name, email address and phone number, place on the waiting list, experiences and propositions of the Bátor Tábor staff and more experienced Volunteers regarding the Volunteer's interview and presence at the programs.</p>	<p>Data preservation time: in the lack of the withdrawal of the data subject's consent, 5 years following the termination of the contact with the Volunteer (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).</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization, Health office team, Management</p>
<p>Following the Volunteer's admission to the Bátor Tábor, the management of the given data, including the management of data on the health sheet of the Volunteers as well.</p> <p>By knowing the data on the list relevant to the Volunteers, the staff of Bátor Tábor can prepare for the organization of sessions and programs, organization of trainings, safe implementation, and the reception of the Volunteer (e.g. personal relationships, diet needs, allocation to houses).</p>	<p>With regard to health care data: GDPR Article 9 (2) a) (the Volunteer gave explicit consent to the management of the aforementioned personal data for one or several specific purposes).</p> <p>With regard to other personal data: GDPR Article 6 (1) b) (data management is necessary for the steps to be taken on the Volunteer's request prior to the conclusion of the agreement concerning volunteering activities concluded between the Volunteer and Bátor Tábor and the performance of the agreement on the volunteering activities), and GDPR Article 6 (1) f) (legitimate interest of Bátor Tábor).</p>	<p>Volunteer general data: name, date of birth, city, zip code, address, email address, father's name, phone number, mother's name, phone number, name, phone number of a third person (third person besides the parents to be notified in case of emergency).</p> <p>The Volunteer's declaration in the agreement on the volunteering activity that they are not registered in the judicial register for crimes against the life, physical soundness and health committed against minors, and for crimes against the freedom of sexual life and sexual morals, and in connection with the crimes above, their criminal responsibility was not found in a final court decision, and is not under criminal proceedings for the grounded suspicion of the crimes above.</p>	<p>Data preservation time: in the lack of the withdrawal of the data subject's consent, 5 years following the termination of the contact with the Volunteer (based on paragraph §(6) of 6 of the Act on Volunteering, the agreement concluded with the Volunteer shall be preserved for 5 years following its termination, and based paragraph §(1) of 6:22 of the Civil Code, any claims regarding application to the camp reach a statute of limitations in 5 years).</p> <p>Access right within the organization of Bátor Tábor: Camp health staff, Health office staff, Health contracted staff, Program and Volunteer organization (OPS), Camp psychologist, Kitchen service provider staff (only concerning diet information)</p>

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<p>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 Volunteers, and these data are necessary for that.</p>	<p>Legitimate interest of Bátor Tábor: Implementation of a safe camp, safety of volunteers and children participating in the camp.</p>	<p>Volunteer's other data: relative's place and date of birth, ID card number.</p> <p>Volunteer's health sheet: Name, date, 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, health competence.</p> <p>Questions relevant to the Volunteer's health: more severe illnesses (e.g. operations, accidents, severe diseases) and any illness because of which receives chronic medical treatment, if possible, providing the year (explain); chronic illnesses (asthma, hypertension, frequent headaches, migraine, stroke, chest pain, cardiac infarction, joint injury, diabetes (Y/N); have you had any disease for which you missed work, if yes, what was the problem (explain); do you have any health problem at present (explain); do you suffer from any infectious disease at present (epidemic hepatitis, acute diarrhea (explain); hepatitis C, hepatitis B, warts, AIDS, mononucleosis) (explain); were you outside Europe in the past month, if yes, where and when, have you had any health problem since then, if yes, what (explain); have you been vaccinated against hepatitis B (Y/N); have you ever had chickenpox? (Y/N); have you been vaccinated against chickenpox (varilrix) (Y/N), if yes, how many times; have you had shingles (Y/N);</p>	

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		<p>when were you last vaccinated against tetanus (in the past 5 years yes (year) / no, (in the past 10 years yes (year) / no; have you been vaccinated against ticks (Y/N), and if yes, when and how many times; other vaccines (explain); do you take any drugs regularly (Y/N) (what, in what dosage); do you have any allergies (pharmaceuticals, food, pollen, dog, cat, etc.) (Y/N); according to your knowledge, are you pregnant (Y/N); do you use an EpiPen (Y/N); were you under pharmaceutical psychiatric treatment in the past 5 years (Y/N); did you take in the past 1 year any psychiatric drugs (Y/N), if yes, what pharmaceutical, how long (explain); is there any information concerning your health condition you have not been asked? (Y/N) declaration: the data above are correct, is not aware of any epidemic disease, and their health condition is appropriate to perform volunteer tasks in Bátor Tátor, date, signature</p> <p>From the Health Staff Volunteer, Bátor Tátor requests also the following data:</p> <p>License, health care recommendations, in case of students of dietetics a proof of school attendance, data of the nursing/medical certificate, certificate of aptitude for physicians/nurses.</p> <p>Other data assisting the organizers in their work:</p>	

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		<p>House allocated to Volunteer (according to colors): which Volunteer belongs to which house/color</p> <p>Staff data:</p> <ul style="list-style-type: none"> - Volunteer's name, position (e.g. house manager/house/program/playing/health staff pal/management), scope of activities (e.g. horseriding/ photo/handicrafts etc.), data about the session Volunteer's name, user name, country, city, zip code, street, house number, phone number, social security (TAJ) number, birthday, nameday, email address, duties, PT/HVC, session, T-shirt size, diet, diet certificate, judicial record - Summary of the persons present, accommodation, 	
<p>Management of the Volunteer's personal data for the fulfilment of the agreement related to volunteer activities (performance on a daily basis). This includes for instance the management of the Volunteer's address, sending official notifications using contact data and information relevant to the contractual duties to be fulfilled.</p>	<p>With regard to health care data: GDPR Article 9 (2) a) (the Volunteer gave explicit consent to the management of the aforementioned personal data for one or several specific purposes).</p> <p>With regard to other personal data: GDPR Article 6 (1) b) (necessary for the performance of a contract directly concluded with the data subject).</p> <p>Transfer of personal data is a contractual requirement; without personal data the Company cannot conclude and perform the agreement.</p>	<p>Health data: any change or other effect which may affect the Volunteer's presence in the camp psychologically or physically (e.g. pregnancy, illness or loss of a close relative, infectious disease, injury, significant life change), any other information which may affect the performance of the activities in Bátor Tátor. In this respect, the Volunteer, based on the agreement relevant to the volunteering activity, is obliged to provide information.</p> <p>Other personal data: the Volunteer's name, date of birth, address, contact data (email, phone number) and any activity and communication containing personal data relevant to the agreement (e.g. communication from the contact person, or any communication from the Volunteer).</p>	<p>In the lack of the withdrawal of consent relevant to health data by the data subject 5 years from the termination of the contractual legal relationship (paragraph §(1) of 6:22 of the Civil Code - unless otherwise provided for in the Civil Code, any claims reach a statute of limitations in 5 years).</p> <p>Access right within Bátor Tátor: Camp health staff, Bátor Tátor staff managing contracts</p>

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, recipients of data transfers
<p>The management of the Volunteer's personal data for measures relevant to compliance questions relevant to the agreement on the volunteering activity or any other measure relevant to the execution of the contract, including the seeking of legal remedies necessary to ensure contractual rights.</p>	<p>With regard to health care data: GDPR Article 9 (2) a) (the Volunteer gave explicit consent to the management of the aforementioned personal data for one or several specific purposes), and GDPR Article 9 (2) f) (data management is necessary for putting forward, exercise or protect legal claims related to data management).</p> <p>With regard to other personal data: legal base of the data management is the legitimate interest of Bátor Tábor (GDPR article 6. (1) f)). Legitimate interest: the management of measures relevant to compliance questions in connection with the agreement and any other measure relevant to the execution of the contract, including the seeking of legal remedies necessary to ensure contractual rights.</p>	<p>Health data: any change or other effect which may affect the Volunteer's presence in the camp psychologically or physically (e.g. pregnancy, illness or loss of a close relative, infectious disease, injury, significant life change), any other information which may affect the performance of the activities in Bátor Tábor. In this respect, the Volunteer, based on the agreement relevant to the volunteering activity, is obliged to provide information.</p> <p>Other personal data: the Volunteer's name, date of birth, address, contact data (email, phone number) and any activity and communication containing personal data relevant to the agreement (e.g. communication from the contact person, or any communication from the Volunteer).</p>	<p>In the lack of the withdrawal of consent relevant to health data by the data subject 5 years from the termination of the contractual legal relationship (paragraph §(1) of 6:22 of the Civil Code - unless otherwise provided for in the Civil Code, any claims reach a statute of limitations in 5 years).</p> <p>Access right within Bátor Tábor: Bátor Tábor staff managing contracts</p>
<p>The evaluation of the performance of Volunteers</p>	<p>GDPR 6. article (1) f) (legitimate interest of Bátor Tábor).</p>	<p>Volunteer's name, session, duties, returning volunteer, house.</p> <p>How did the Volunteer contribute to the success of the camp?</p>	

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	<p>Legitimate interest of Bátor Tábor: gathering experience related to Volunteers, thus increasing the success and safety of future sessions. For the sake of the safety of the participating children Bátor Tábor must be aware who are the Volunteers who can cooperate with the organizers and the participating children most efficiently. The evaluation is confidential information of Bátor Tábor, which can be viewed by the Volunteer at the end of the session under the supervision of an OPS.</p>	<p>(1. activity, 2. cooperation, 3. communication, 4. flexibility, 5. focus on camp participants, 6. adherence to the regulations), and a brief explanation.</p> <p>In what can the Volunteer develop further?</p> <p>(1. activity, 2. cooperation, 3. communication, 4. flexibility, 5. focus on camp participants, 6. adherence to the regulations), and a brief explanation.</p> <p>In what the Volunteer did not meet camp expectations?</p> <p>(1. activity, 2. cooperation, 3. communication, 4. flexibility, 5. focus on camp participants, 6. adherence to the regulations), and a brief explanation.</p> <p>Site, date, the person performing the evaluation,</p>	<p>Data preservation time: 5 years following the termination of the contact with the Volunteer (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).</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization (OPS), Camp middle management</p>
<p>Expulsion report - summary of the Volunteer's inappropriate behavior in the camp.</p>	<p>GDPR 6. article (1) f) (legitimate interest of Bátor Tábor).</p> <p>Legitimate interest of Bátor Tábor: with the help of the report, organizers of Bátor Tábor can decide about the Volunteer's future participation by knowing expulsion data, thus enhancing the implementation of a safer camp participation.</p>	<p>Volunteer's name, description of their behavior in the camp, description of the views of other Volunteers and supervisors regarding organization and joint work.</p>	<p>Data preservation time: 5 years following the termination of the contact with the Volunteer (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).</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization (OPS), Management, Report verifiers (may be other Volunteer)</p>

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<p>Records of accidents and unexpected hazardous events during the camp</p>	<p>With regard to health care data: GDPR 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);</p> <p>With regard to other personal data: GDPR 6. article (1) f) (legitimate interest of Bátor Tátor).</p> <p>Legitimate interest of Bátor Tátor: documenting accidents and unexpected hazardous 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.</p>	<p>Accident report: The injured person's name, address, permanent staff/volunteer/Camp participant, date of the accident, exact time of the accident, exact location of the accident, 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.), is reporting necessary to the National Center of Public Health, if yes, by whom and when, is advising the insurance company necessary, if yes, by whom and when</p>	<p>Data preservation time: 5 years following the termination of the contact with the Volunteer (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).</p> <p>Access right within the organization of Bátor Tátor: Program and Volunteer organization (OPS), Management, Health office staff, Health contracted staff, Report verifiers (may be other Volunteer).</p>

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		<p>Report of unexpected hazardous situations: Date and exact time of the event (if necessary), brief description of the problematic situation with names of the persons concerned, action plan (naming 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 (Following a strategy according to the protocol, or if it does not work, inventing a new one and following it, measures taken, risks) how was the emergency managed, what was the result, communication strategy, recommendation to prevent similar incidents in the future, filled in by (name), signature, date, is it necessary to report the incident to the State Sanitary Service and the insurance company, if yes, by whom, when.</p>	
<p>Declaration about the Volunteer's independent travelling</p> <p>This happens when the Volunteer has to leave the camp abruptly for some reason.</p>	<p>GDPR 6. article (1) f) (legitimate interest of Bátor Tábor).</p> <p>Legitimate interest of Bátor Tábor: exact documentation of the responsibilities regarding the travelling of the Volunteer.</p>	<p>Volunteer's data: name, birth name, place and date of birth, ID card number, date of travelling (year, month, day), declaration that the Volunteer takes responsibility for travelling home and was informed about their options, declaration of acceptance that the responsibility of Bátor Tábor terminates as soon as the Volunteer leaves the campsite, date, signature.</p>	<p>Data preservation time: 5 years following the termination of the contact with the Volunteer (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).</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization (OPS), Management, Report verifiers (may be other Volunteer).</p>

<p>Preparing videos, photos, interviews and other media material with regard to the camp, in which the Volunteer can be present.</p> <p>The records are necessary so that Bátor Tábor can document their activities during the camp by making videos, taking photos and making interviews, and to present it to external persons and by this raise funds for its operations.</p> <p>Bátor Tábor, and any third person commissioned by them can use these materials to promote Bátor Tábor in the information materials of Bátor Tábor and the SeriousFun Children's Network (a world camp association promoting the work of experience camps) can publish them on their own platforms or in the media, by publishing quotes, articles or short film excerpts, photos.</p>	<p>With regard to health care data: GDPR Article 9 (2) a) (the Volunteer gave explicit consent to the management of the aforementioned personal data for one or several specific purposes).</p> <p>With regard to other personal data: GDPR Article 6. (1) a) (the volunteer consent of the Volunteer).</p> <p>The Volunteer is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In the lack of consent by the Volunteer, the media materials cannot be prepared.</p>	<p>Videos and photos taken, interviews made in the camp and other media materials. E.g.: records in accordance with Bátor Tábor's philosophy (e.g. highlighting the significance of volunteering or the community-forming power of Bátor Tábor).</p>	<p>Data preservation period: On the Volunteer's request the record and media material can be deleted at any time. The right to withdrawal in case of records and media materials already released for the public can fully be exercised until the publication of such materials. Third persons can save and/or make copies of the records and materials published, Bátor Tábor cannot control that.</p> <p>Access right within the organization of Bátor Tábor: until the publication of the records Bátor Tábor staff managing contracts</p> <p>Records of the Volunteer with regard to public event activities, and in case of mass recordings, the Volunteer's consent is not needed for the preparation and the usage of the records (Civil Code 2:48. §).</p> <p>The privacy policy of SeriousFun Children's Network can be accessed here: https://www.seriousfunnetwork.org/privacy-policy</p> <p>Bátor Tábor may provide information about the qualifications of the Volunteers to SeriousFun Children's Network in case the Volunteer has a crucial role for security in the life of the camp (e.g. is a lifeguard, or has special qualifications in a sports activity).</p>
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<p>Participation in the Bátor Alumni program, and recording data relevant to this.</p> <p>Bátor Alumni was established by Bátor Tábor for former Camp participants and Volunteers so that they 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.</p>	<p>GDPR Article 6. (1) a) (the former Volunteer's consent).</p> <p>The former Volunteer is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In the lack of consent, the former Volunteer cannot participate in the Alumni program.</p>	<p>The Volunteer's name, e-mail address, phone number, address.</p>	<p>On the former Volunteer's request the data can be deleted at any time (until withdrawal).</p> <p>Access right within the organization of Bátor Tábor: Tábosz,marketingteam, development team, OPS, Bátor Tábor management</p>

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, recipients of the data transfer
<p>Bátor Tábor is allowed to contact the Volunteer whether they are willing to contribute publicly to any charity event, press event in the future?</p>	<p>GDPR Article 6. (1) a) (the data subject's consent)</p> <p>The Volunteer is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In the lack of consent from the Volunteer Bátor Tábor cannot contact the them whether they are willing to contribute publicly to any charity event, press event in the future.</p>	<p>The Volunteer's name, e-mail address, phone number, address</p>	<p>On the Volunteer's request the data can be deleted at any time (until withdrawal).</p> <p>Access right within the organization of Bátor Tábor: Tábosz,marketingteam, development team, OPS, Bátor Tábor management</p>
<p>Bátor Tábor can contact the Volunteer for the purposes of research in the future, e.g. survey about experiences regarding Bátor Tábor.</p>	<p>GDPR Article 6. (1) a) (the data subject's consent)</p> <p>The Volunteer is entitled to withdraw their consent at any time. The withdrawal of the consent does not affect the lawfulness of data management based on consent prior to the withdrawal.</p> <p>In the lack of consent from the Volunteer Bátor Tábor cannot contact the Volunteer for research purposes.</p>	<p>The Volunteer's name, e-mail address, phone number, address</p>	<p>On the Volunteer's request the data can be deleted at any time (until withdrawal).</p> <p>Access right within the organization of Bátor Tábor: Tábosz,marketingteam, development team, OPS, Bátor Tábor management</p>

The objective of data management	The legal basis of data management	The scope of data	Data preservation period, access rights, recipients of the data transfer
<p>Compulsory data provision in the Adult Education Data Provision System (FAR)</p> <p>Bátor Tábor is obliged to transfer the aforementioned personal data to the Adult Training Data Provision System (FAR), as volunteer training according to the provisions of the Act on Adult Training is considered a free adult training course.</p>	<p>Bátor Tábor manages personal data in order to fulfil the relevant legal obligation (paragraph 15 of the Act on Adult Training) based on GDPR Article 6. (2) c)</p>	<p>The name, birth name, mother's name, birth country, place of birth, date of birth, email address, citizenship, highest educational achievement of the volunteer participating in the volunteer training.</p> <p>The source of the personal data is the volunteer.</p>	<p>Eight years (following the data transfer to the FAR system, the data preservation time of the system).</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization</p>
<p>Organization of the adult training</p> <p>Bátor Tábor is obliged to conclude an adult training contract with the data subjects and manage the aforementioned personal data, as volunteer training according to the provisions of the Act on Adult Training is considered a free adult training course.</p>	<p>Bátor Tábor manages personal data in order to fulfil the relevant legal obligation (paragraph 21 of the Act on Adult Training) based on GDPR Article 6. (2) c)</p>	<p>The name, birth name, mother's name, birth country, place of birth, date of birth, email address, citizenship, highest educational achievement of the volunteer participating in the volunteer training, data relevant to the training (e.g. entry into the course, doing the course or leaving the course, evaluation)</p> <p>The source of the personal data is the volunteer.</p>	<p>Preservation time is the last day of the eighth year following the conclusion of the adult training contract.</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization</p>
<p>Documentation of the implementation of the adult training</p> <p>Bátor Tábor is obliged to document the training provided for volunteers as an adult training course and manage the aforementioned personal data, as volunteer training according to the provisions of the Act on Adult Training is considered a free adult training course.</p>	<p>Bátor Tábor manages personal data in order to fulfil the relevant legal obligation (paragraph 16 of the Act on Adult Training) based on GDPR Article 6. (2) c)</p>	<p>The name, birth name, mother's name, birth country, place of birth, date of birth, email address, citizenship, highest educational achievement of the volunteer participating in the volunteer training, data relevant to the training (e.g. entry into the course, doing the course or leaving the course, evaluation), attendance sheets signed by the employee participating in the course</p> <p>The source of the personal data is the volunteer.</p>	<p>Preservation time is the last day of the eighth year following the compilation of the document.</p> <p>Access right within the organization of Bátor Tábor: Program and Volunteer organization</p>

5. DATA FORWARDING

For the performance of tasks related to data management activities, Bátor Tátor 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 Tátor.

Bátor Tátor 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 Tátor and the data processor. Following the performance of the data management in the name of Bátor Tátor the data manager, according to the choice of Bátor Tátor 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
<p>Mrs Katalin Kardos Horváth Address: 1135 Budapest, ReitterFerenc utca 46-48. Phone number: +36 06 1 302 88 08 E-mail address: k.kardos@batortabor.hu</p>	<p>Mrs Katalin Kardos Horváth is the dietician of Bátor Tátor: she receives data relevant to the diseases and food allergies of the Volunteers so that the safe meals for Volunteers can be guaranteed during the camp.</p>
<p>Angelika Szabó Address: 1135 Budapest, ReitterFerenc utca 46-48. Phone number: +36 6 1302 8808 E-mail address: a.szabo@batortabor.hu</p>	<p>Angelika Szabó is member of the health staff of Bátor Tátor, she receives the data of Volunteers so that she can provide appropriate medical background for Volunteers during the session.</p>
<p>Anna Dorka Kocsis Address: 1135 Budapest, ReitterFerenc utca 46-48. Phone number: +36 20 278 4316 E-mail address: d.kocsis@batortabor.hu</p>	<p>Anna Dorka Kocsis is the psychologist of Bátor Tátor. In case she would like to request further information regarding the admission of the Volunteer to Bátor Tátor, she may contact the Volunteer.</p>
<p>Infosector Kft. Address: 1117 Budapest, Fehérvári út 50-52. Phone number: +36 1 800 8115 E-mail address: hello@infosector.hu</p>	<p>The system administrator of Bátor Tátor. During his activities, he has access to the data managed by Bátor Tátor.</p>
<p>Maileon - Wanadis Kft. 1112, Budapest, Budaörsi út 153.</p>	<p>Manages the address list and the sending of newsletters for Bátor Tátor.</p>
<p>OTP TRAVEL KFT. 1051 Budapest, Nádor u. 21.</p>	<p>Provides travel insurance for the accompanying pals.</p>

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 VOLUNTEER

7.1 Data protection rights and legal remedies

Data protection rights and legal remedies of Volunteers 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 Volunteers about their rights and legal remedies relevant to data management accordingly.

Bátor Tábor informs the Volunteer about measures following their request without unsubstantiated delay, but in any event within one month following the Volunteer'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 Volunteer 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 Volunteer's request, in case the identity of the data subject was verified otherwise. In case the Volunteer submitted their request electronically, if possible, the information shall be given electronically, unless the Volunteer requests otherwise.

In case Bátor Tábor does not take measures following the Volunteer's request, they shall inform the Volunteer 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 Volunteer can submit a complaint at a supervisory authority and may seek legal remedy in court.

7.2 The Volunteer's access rights

- (1) The Volunteer 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 Volunteer 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 Volunteer 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 Volunteer, 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 Volunteer.
- (2) In case personal data are forwarded to a third country, the Volunteer 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

Volunteer by Bátor Tábor. For any further copies requested by the Volunteer Bátor Tábor may charge a reasonable fee, based on the administrative costs. In case the Volunteer submitted their request electronically, the information shall be given to them in a widely used electronic format, unless the Volunteer requests otherwise.

7.3 The right to rectification

The Volunteer shall have the right that Bátor Tábor on their request rectifies the inaccurate personal data concerning them without delay. The Volunteer 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 Volunteer 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 Volunteer withdraws their consent constituting the basis of data management, and the data management has no other legal basis;
 - c) the Volunteer 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 Volunteer 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 substantially; or
 - d) to establish, exercise or defend legal claims.

7.5 The right to the restriction of data management

- (1) The Volunteer 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 Volunteer 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 Volunteer 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 Volunteer needs them to put forward, exercise or protect legal claims; or
 - d) the Volunteer 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 Volunteer.

- (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 Volunteer'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 Volunteer 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 Volunteer, on their request are informed about these addressees by Bátor Tábor.

7.7 Right to data portability

- (1) The Volunteer 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 Volunteer 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 Volunteer 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 Volunteer, 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 Volunteer has the right to protest at any time against the management of the Volunteer's personal data for this purpose, including profiling, when it is connected to direct marketing.**
- (3) In case the Volunteer 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 Volunteer 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 Volunteer has the right to protest for reasons relevant to their own situation against the management of the Volunteer'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 Volunteer 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 Volunteer considers the management of personal data of the Volunteer 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: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; 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 Volunteer is entitled to effective court remedy against the supervisory authority's legally binding decision relevant to the Volunteer.
- (2) The Volunteer is entitled to effective court remedy in case the supervisory authority in charge does not deal with the complaint, or does not inform the Volunteer 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 Volunteer is entitled to effective court legal remedy without the 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 Volunteer. 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.

, 2018
Signature:

Name (in capital letters):

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