

# PRIVACY POLICY

## I. Introduction

Csodalámpa Óhaj - Sójaj Kívánságteljesítő Foundation (registered: 1125 Budapest, Alsó - Svábhegyi út 11.; registration number: 01-01-0008929, hereinafter referred to as: „**Csodalámpa Foundation**” or „**Data Controller**”) the operator of [www.csodalampa.hu](http://www.csodalampa.hu) website („**Website**”) is committed to the protection of personal data. During its activities, it complies with the rules set out in this privacy policy („**Privacy Policy**”), and the relevant data protection law, especially the Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016, („**GDPR**”), the Act CXII of 2011 on the right to information self-determination and freedom of information („**Information Act**”), and the Act XLVII of 1997 on the processing and protection of health and related personal data („**Eüaktv.**”).

In accordance with the principles of legality, fairness and transparency, the present Privacy Policy includes the rules relating to the processing of personal data related to the use of the Website of the Csodalámpa Foundation.

## II. Data Controller

The controller of the personal data is Csodalámpa Foundation.

Contact details of Csodalámpa Foundation:

phone number: +36 (1) 3270910

e-mail address: [info@csodalampa.hu](mailto:info@csodalampa.hu)

website: [www.csodalampa.hu](http://www.csodalampa.hu)

Contact details of Csodalámpa Foundation's data protection officer:

e-mail address: [adatvedelem@csodalampa.hu](mailto:adatvedelem@csodalampa.hu)

phone number: +36 (1) 3270910

The definitions used in this Privacy Policy are included in Article 4. of GDPR and data protection principles in Article 5. The Hungarian version of GDPR can be read by [<https://net.jogtar.hu/jogszabaly?docid=A1100112.TV> clicking here].

## III. Introduction to data processing, scope of data processed, purpose and legal basis of data processing

### 1. Data processing related to „Csodabogarak” campaign

When participating in the „Csodabogarak” campaign, you have the opportunity to raise and donate funds for participation in sport or other events, or donate privately linked to an event or independent thereof.

Type of the data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing
name; phone number; e-mail address; type of sport or name of event ; introduction	Organising and managing campaigns on <a href="http://www.csodabogarak.com">www.csodabogarak.com</a>	Consent of the data subject GDPR Article 6 (1)	For 1 year after the end of the event or until the withdrawal

text, description of event; photo; name of the team	website.	para.a)	of consent.  The data subject shall have the right to withdraw his or her consent at any time, provided that the withdrawal of the consent does not affect the lawfulness of data processing prior to the withdrawal.  The Data Controller is obliged to keep the accounting documents (together with the personal data contained therein) for 8 years (if applicable)
name, (anonymous donation is also possible); e-mail address; amount of donation; postcode; public comment (optional); personal message for the Csodalámpa Foundation (optional); introductory text (optional); photo (optional); supported event	Managing, processing, administration and confirmation of the donation.	Consent of the data subject  GDPR Article 6.(1) para. a)	Until the withdrawal of the consent.  The data subject shall have the right to withdraw his or her consent at any time, provided that the withdrawal of the consent does not affect the lawfulness of the data processing prior to the withdrawal.  The Data Controller is obliged to keep the accounting documents (together with the personal data contained therein)for 8 years.

## 2. Data processing related to Wish fulfilment

Csodalámpa Foundation may process in particular the following personal data provided by data subjects in connection with the fulfilment of wishes:

Type of the data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing
The following data about the concerned child	Determination of the right to make a wish and the organisation	Consent of the data subject	Until the fulfilment of the wish or until the

<ul style="list-style-type: none"> <li>• name;</li> <li>• information on the health status, i.e. the name of the child's illness;</li> <li>• mother's name</li> <li>• place and date of birth,</li> <li>• address;</li> <li>• phone number</li> <li>• name of legal representative;</li> <li>• the child's passport and ID number, in case it is needed to fulfil the wish;</li> <li>• photo</li> </ul>	<p>and delivery of the wish fulfilment.</p>	<p>GDPR Article 6 (1) para. a)</p> <p>If the child concerned, has not reached the age of 16, the consent shall be given by the legal representative.</p> <p>The legal basis for processing the child's health data is the written consent of the data subject in accordance with the Act XLVII of 1997 on the processing and protection of health and related personal data.</p>	<p>withdrawal of consent.</p> <p>The data subject shall have the right to withdraw his or her consent, provided that the withdrawal does not affect the lawfulness of data processing prior to the withdrawal.</p>
<p>The following data about the concerned child</p> <ul style="list-style-type: none"> <li>• name;</li> <li>• place and date of birth,</li> <li>• address</li> <li>• photo</li> </ul>	<p>Communication of the fulfilled wish on social media.</p>	<p>Consent of the data subject</p> <p>GDPR Article 6 (1) para. a)</p> <p>If the child concerned, has not reached the age of 16, the consent shall be given by the legal representative.</p>	<p>Until the fulfilment of the wish or until the withdrawal of consent.</p> <p>The data subject shall have the right to withdraw his or her consent, provided that the withdrawal does not affect the lawfulness of data processing prior to the withdrawal.</p>
<p>The following data about the concerned child</p> <ul style="list-style-type: none"> <li>• name;</li> <li>• place and date of birth,</li> <li>•</li> </ul>	<p>The fulfilment of the criterion specified in the statutes of Csodalámpa Foundation, namely that a child is entitled to the wish fulfilment</p>	<p>legitimate interest</p> <p>GDPR Article 6.(1) para. f)</p>	<p>Until the child concerned turns 21 years old.</p>

	only once.		
<p>The following data about the concerned child's parent, guardian or other caretaker:</p> <ul style="list-style-type: none"> <li>• name;</li> <li>• address;</li> <li>• correspondence address;</li> <li>• phone number;</li> <li>• e-mail address;</li> <li>• tax number (if needed);</li> <li>• bank account number (if needed);</li> <li>• licence plate number (if needed)</li> </ul>	<p>Keeping in touch in order to organise and deliver the fulfilment of the child's wish.</p>	<p>Consent of the data subject</p> <p>GDPR Article 6.(1) para. a)</p>	<p>Until the fulfilment of the wish or until the withdrawal of consent.</p> <p>The data subject shall have the right to withdraw his or her consent at any time, provided that the withdrawal does not affect the lawfulness of data processing prior to the withdrawal.</p>
<p>The following data about the concerned child's doctor or other medical person:</p> <ul style="list-style-type: none"> <li>• name;</li> <li>• correspondence address;</li> <li>• phone number;</li> <li>• e-mail address;</li> <li>• name and address of workplace</li> <li>• tax number (if needed);</li> <li>• bank account number (if needed);</li> </ul>	<p>To assess the health risks associated with fulfilling the wish and to be in contact in order to progress, Organisation and delivery of the child's wish.</p>	<p>Consent of the data subject</p> <p>GDPR Article 6.(1) para. a)</p>	<p>Until the fulfilment of the wish or until the withdrawal of consent.</p> <p>The data subject shall have the right to withdraw his or her consent, provided that the withdrawal does not affect the lawfulness of data processing prior to the withdrawal.</p> <p>The Data Controller is obliged to keep the accounting documents (together with the personal data contained therein) for 8 years. (if</p>

			applicable)
<p>The following data of the volunteers participating in the fulfilment of the wish;</p> <ul style="list-style-type: none"> <li>• name;</li> <li>• place and date of birth;</li> <li>• mother's name;</li> <li>• nationality;</li> <li>• address;</li> <li>• correspondence address;</li> <li>• phone number;</li> <li>• e-mail address;</li> <li>• name and address of workplace</li> <li>• tax number (if needed);</li> <li>• bank account number (if needed);</li> <li>• licence plate number (if needed)</li> </ul>	<p>Fulfilment of the contract concluded with the volunteer, keeping in touch in order to fulfil, organise and deliver the child's wish, as well as, arranging the transfer of any transfer of the possible reimbursement.</p>	<p>Fulfilment of contract</p> <p>GDPR Article 6.(1) para. b)</p>	<p>For 5 years after the termination of the contract.</p> <p>The Data Controller is obliged to keep the accounting documents (together with the personal data contained therein) for 8 years. (if applicable)</p>

The data processed may be disclosed to those natural and legal persons who participate in the fulfilment of the wishes.

Csodalámpa Foundation may transfer the data of the child concerned in order to fulfil the wish

a) the child's doctor;

b) to the legal or natural person(s) fulfilling the wish;

c) if the wish is fulfilled from a tender source to the tenderer, in accordance with the tender's conditions or during the subsequent mandatory settlement of the tender won.

### 3. Healing Magic/GyógyBűvészet

The "Csodalámpa GyógyBűvészet" is the Hungarian adaption of David Copperfield Project Magic programme, which is launched by Csodalámpa Foundation in many hospitals with the permission of the world-famous magician and with the help of magician Kelle Botond. The aim of the Healing Magic/GyógyBűvészet is to support the medical rehabilitation in a special entertaining way – by using magic tricks that support the healing of a specific disease. The short films that teach and explain the magic tricks are accessible after registration on the following link: <https://gyogybuveszhet.hu/>

Type of the data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing
name, e-mail address; password	Registration; providing access; identification of the user; contact,	Consent of the data subject  GDPR Article 6.(1) Paragraph a)	Until the user delete his/her registration.

name, e-mail address and telephone number of the designated contact person in the participating hospitals	Organizing trainings, keeping in touch	Fulfilment of contract GDPR Article 6.(1) para. b)	For 5 years after the termination of the contract.  The Data Controller is obliged to keep the accounting documents (together with the personal data contained therein) for 8 years. (if applicable)
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#### 4. Data processing related to donation (independent of a project)

If you wish to donate for the Csodalámpa Foundation, you can accomplish it through the following webpage <https://www.csodalampa.hu/csodalampa/Adom%C3%A1nyoz%C3%A1s>.

Thank you for your donation!

Type of the data processed	Purpose of data processing	Legal basis of data processing	Duration of data processing
name; e-mail address, postcode; city; amount of donation; public comment(optional); personal message for the Csodalámpa Foundation (optional); introductory text (optional); photo (optional);	Managing, processing, administration and confirmation of donations	Consent of the data subject  GDPR Article 6 (1) para. a)	Until the withdrawal of consent.  The data subject shall have the right to withdraw his or her consent, provided that the withdrawal does not affect the lawfulness of data processing prior to the withdrawal.  The Data Controller is obliged to keep the accounting documents (together with the personal data contained therein) for 8 years.

The Csodalámpa Foundation – among others – uses Paypal system to raise donations. More details on the Paypal Privacy Policy are available on the following link: <https://www.paypal.com/hu/webapps/mpp/ua/privacy-full#6>.

Donations by credit card payment can be processed through SimplePay. More information on the Simple Pay Privacy Policy can be found on the following link: <https://simplepay.hu/adatkezeles-tajekoztatok/>

#### 5. Data processing related to webshop

By ordering online through the Website, you, as a customer, can purchase the products sold in the store in accordance with the conditions set out in the Webshop Terms and Conditions.

<b>Type of the data processed</b>	<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>	<b>Duration of data processing</b>
name; username; e-mail address; delivery address; phone number	Completion of the order, handling complaint, internal analysis.	Fulfilment of the contract  GDPR Article 6.(1) para. b)	For 1 year after the completion of the contract.  The Data Controller is obliged to keep the accounting documents (together with the personal data contained therein) for 8 years.

Payment of the orders by credit card can be processed through SimplePay. More information on the Simple Pay Privacy Policy can be found on the following link: <https://simplepay.hu/adatkezesi-tajekoztatok/>

Payment of the order is also possible through Paypal system. More details on the Paypal Privacy Policy are available on the following link: <https://www.paypal.com/hu/webapps/mpp/ua/privacy-full#6>.

Csodalámpa Foundation transfers the personal data for the completion of the orders to Homály és Társai Ltd. (1038 Budapest, Észak utca 21.; company registration number: 01-09-672178).

Csodalámpa Foundation transfers personal data to OTP Mobil Kft. (1093 Budapest, Közraktár u. 30-32.) for the purpose of providing customer service assistance to users, confirming transactions and for fraud monitoring to protect users.

## **6. Data processing related to Newsletter**

If you consent to that, Csodalámpa Foundation will use your name and e-mail address to send you newsletter. You have the right to unsubscribe from the newsletter at any time, which also terminates data processing. In this case, Csodalámpa will delete all your personal data - necessary for sending of the newsletters - from its register and will not approach you with any further newsletters. You can unsubscribe from the newsletter by clicking on the link in the message, or you can indicate your intention to unsubscribe by e-mail to the e-mail address [info@csodalampa.hu](mailto:info@csodalampa.hu).

<b>Type of the data processed</b>	<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>	<b>Duration of data processing</b>
name, e-mail address	Sending of newsletter	Consent of the data subject  GDPR Article 6.(1) para. a)	Until the withdrawal of consent.  The data subject shall have the right to withdraw its consent, provided that the withdrawal does not affect the lawfulness of data processing prior to the

			withdrawal.
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During each data processing (Privacy Policy Section III/1-5), the employees of Csodalámpa Foundation are entitled to get to know the processed data to the extent that is necessary for the completion of their task.

#### **IV. Data processors**

The Csodalámpa Foundation may share the personal data it manages with service providers who process the personal data on behalf of and in accordance with the instructions of the Csodalámpa Foundation, as a so-called data processor:

#### **V. Rights of data subjects**

##### *Right of access*

The data subject shall have the right to obtain information from the Data Controller as to whether or not personal data concerning him or her are being processed, and, where that is the case, he or she is entitled to access to the personal data and the information being processed. In this context, the data subject has inter alia the right to know what personal data the Data Controller has; on what legal basis; for what purpose; how long they keep it; and to whom, when, under what legislation the Data Controller provided access to his or her personal data or to whom he transferred his or her personal data. Data subject has the right to obtain a copy about his or her personal data processed by the Data Controller.

##### *Right to rectification*

The data subject has the right to request Data Controller to correct personal data that is inaccurate or needs correction. In certain cases, the data subject has the right to have inaccurate personal data relating to him or her corrected or completed at his or her request.

##### *Right to erasure*

In certain cases, the data subject shall have the right to have his or her personal data deleted at his or her request, and the Data Controller may be obliged to delete such data.

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

The data Subject has the right to restrict processing his or her personal data. In this case, the relevant personal data may only be processed for specified purposes.

##### *Right to data portability*

In certain cases, the data subject shall have the right to receive the personal data concerning him or her, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

In certain cases, in exercising his or her right, the data subject shall have the right to ask for the personal data transmission directly from one controller to another, where technically feasible.

##### *Right to object*

In certain circumstances the data subject has the right to object to processing his/her personal data or to ask the Data Controller to stop processing his/her personal data.

If the data subject wishes to exercise the above rights or has any questions related to them, he or she can do so by contacting the Data Controller at the contact details indicated in Section II.

The Data Controller shall respond to the inquiries within shortest time possible, but no later than within one month. The date of receipt of the inquiry does not count into the deadline.

## **VI. Right of appeal**

If the data subject considers that the Data Controller has violated the applicable data protection provisions during the processing of personal data, the data subject is entitled to file a complain at the National Data Protection and Freedom of Information Authority (address: 1055 Budapest, Falk Miksa u. 9-11, postal address: 1363 Budapest, Pf. 9., phone number.: +36 (1) 391-1400, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)) or has the opportunity to go to court to protect his or her data. In the latter case, he or she can decide freely whether to turn to the court competent according to his or her residence (permanent address) or place of residence (temporary address) or the controller's registered office.

## **VII. Data processing for different purposes**

In case, Csodalámpa Foundation wishes to carry out further data processing on the collected data for a purpose other than the purpose of their collection, it shall inform the data subjects about this different purpose and about all other relevant information prior to further data processing.

## **VIII. Amendment of this Privacy Policy**

Csodalámpa Foundation is entitled to amend the information set out in this document in case of a change in the legal environment or in the data processing activities. The date of this document is indicated at the end of the document. Please ensure that you review this document from time to time in order to have up-to-date information regarding the processing of your personal information.

Budapest 26 February 2021