

## AmCham Hungary Privacy Policy

This Privacy Policy ("**Privacy Policy**") provides you with the information regarding the processing of your personal data by the American Chamber of Commerce in Hungary (AmCham) with address at H-1051 Budapest, Szent István tér 11. You can also reach us by e-mail ([info@amcham.hu](mailto:info@amcham.hu)), or contact József Gál Policy Officer ([jozsef.gal@amcham.hu](mailto:jozsef.gal@amcham.hu)).

### Definitions used in this Policy

In this section you can find the definitions for the purpose of this Privacy Policy.

- **Personal Data:** means any information relating to you through which we can identify you directly or indirectly, including your name, position, e-mail address and phone number; Personal Data is also often referred to as Personally Identifiable Information (PII);
- **Data Processing:** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Data Processor:** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of AmCham.

### Data Processing Principles

- We process your Personal Data in compliance with all the relevant laws, fairly and in a transparent manner.
- We process your Personal Data only for specified and legitimate purposes as described in this Privacy Policy.
- We do not process your Personal Data which is not adequate, relevant or necessary for the purposes set out in this Privacy Policy.
- We do our best to keep your Personal Data accurate and up to date. We take every reasonable step to ensure that inaccurate Personal Data is erased or rectified without delay.
- We keep your Personal Data in a form which enables Us to identify You for no longer than needed, for the purposes for which your Personal Data is processed.
- We process your Personal Data in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

We will always process Your Personal data in compliance with the European standards on data protection. We provide an adequate level of protection to your Personal Data by E.U. standards. We do not transfer your Personal Data outside the European Economic Area ensuring adequate level of protection. In the event of any inquiries coming from state, administrative or investigative authorities, we may be obliged to provide these authorities with Personal Data if they request us to do so. We do

not carry out any automated decision-making or profiling activities while processing your Personal Data, unless directly stated otherwise in our information provided to you.

## **Legal Background**

We process your Personal Data in accordance with all the applicable laws, thus especially the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**General Data Protection Regulation**” or “**GDPR**”).

## **How do we collect your Personal Data?**

We collect your Personal Data through the membership registration form, member information update forms, e-mail newsletter registration, Committee registration, event registration forms and/or the amcham.hu website. This information includes, but is not limited to, your name (first and last), company name, company address, phone number, e-mail address. You should be aware that if you disclose any information on a video conferencing tool, bulletin board, e-mail distribution list or in a chat room or other open forum that is hosted by AmCham, others may collect that information to send you unsolicited information from outside AmCham, or for other purposes. For the avoidance of doubt in latter case processing of your Personal Data by third parties is beyond AmCham’s control.

## **Why do we process Your Personal Data?**

We use your Personal Data for different purposes, depending on your engagement with us. Below you will find a list of such purposes together with relevant further information. Please note that not all purposes might apply on you. For example, if you only subscribed to a newsletter then we will process your Personal Data only for this purpose.

### ***Newsletters and other direct marketing communication***

- **Purpose:** to reach you with invitations, the latest news and information on our advocacy work, past and upcoming events and special offers from fellow AmCham members. If you are a member of AmCham then we can also send you the latest news and information regarding your membership.
- **Legal basis:** your consent.
- **Categories of personal data:** name, title, phone numbers, e-mail addresses, company name, position.
- **Retention time:** we will keep your Personal Data until deletion of your account.
- **Data Processors:**
  - IBCnet-Magyarország Kft. (Company Reg. No.: 01-09-665688, address: 1095 Budapest, Mester utca 87., VAT number: 11314084-2-43, website: [www.ibcnet.hu](http://www.ibcnet.hu))
  - Mailchimp (The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA, website: <https://mailchimp.com>)
- **Data transfer to third parties other than processors:** there is no data transfer to third parties.
- **Profiling or automated decision making:** neither of these is performed.

### ***Membership in AmCham***

- **Purpose:** to create and maintain your membership or the membership of the entity which you are representing or where you have been designated as a contact person for the member.
- **Legal basis:**
  - where you are the member, or you are the representative of the member: performance of a contract or taking steps prior to entering into a contract;
  - where you are a contact person of the member: consent.
- **Categories of personal data:** name, title, phone numbers, e-mail addresses, company name, position.
- **Retention time:** we will keep your Personal Data until you are a member of AmCham. Where you are a representative or contact person of a member, we will keep your Personal Data until you hold this position. In both cases we may further store your Personal Data in our corporate files or archives until the applicable retention time but no longer than 20 years.
- **Data Processors:**
  - IBCnet-Magyarország Kft. (Company Reg. No.: 01-09-665688, address: 1095 Budapest, Mester utca 87., VAT number: 11314084-2-43, website: www.ibcnet.hu)
  - szamlazz.hu
- **Data transfer to third parties other than processors:** there is no data transfer to third parties unless exceptional cases where we have to respond a query from a court, law enforcement or other authority.
- **Profiling or automated decision making:** neither of these are performed.

### ***Communication regarding your membership***

- **Purpose:** to reach you with information on your membership or the membership of the entity where you are a representative or a contact person.
- **Legal basis:** your consent.
- **Categories of personal data:** name, title, phone numbers, e-mail addresses, company name, position.
- **Retention time:** we will keep your Personal Data until deletion of your account.
- **Data Processors:**
  - IBCnet-Magyarország Kft. (Company Reg. No.: 01-09-665688, address: 1095 Budapest, Mester utca 87., VAT number: 11314084-2-43, website: www.ibcnet.hu)
- **Data transfer to third parties other than processors:** there is no data transfer to third parties.
- **Profiling or automated decision making:** neither of these are performed.

### ***Event attendance and photos/videos of events***

- **Purpose:** organising the event, tracking your attendance, following up with you and preparing reports about attendees
- **Legal basis:** your consent.
- **Categories of personal data:** your name, company name, position, email address, phone number, photo and/or video.
- **Retention time:** we will retain list of guests and photos and videos for an indefinite period of time in our archives.

- **Data Processors:**
  - IBCnet-Magyarország Kft. (Company Reg. No.: 01-09-665688, address: 1095 Budapest, Mester utca 87., VAT number: 11314084-2-43, website: www.ibcnet.hu) **(event attendance)**
  - we may use third party service providers for taking pictures or videos at the events. If you wish to receive more information on them, please contact the event attendant.
- **Data transfer to third parties other than processors:** by registering, you allow AmCham to share the list of guests including guest name, company name and position with the event partners and sponsors. By attending, you give us permission to use the photograph/video or recordings in publications or other media material produced offline and online for news, advertising and promotional purposes without written permission and compensation.
- **Profiling or automated decision making:** neither of these is performed.

### Cookies on our website

A cookie is a piece of data stored on a user's hard drive containing information about the user. By using the website you consent to the use of cookies and similar techniques. The information below explains the cookies we use on our website and why we use them:

- **Google Analytics cookies:** we use these cookies to collect information about how visitors use our website, including details of the site where the visitor has come from and the total number of times a visitor has been to our website. We use the information to improve our website and enhance the experience of its visitors.
- **Drupal (website) cookie** that we use to allow visitors to view the website with the best possible viewer experience for their device. Once you close your browser, the cookie is deactivated.

You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at: [www.allaboutcookies.org](http://www.allaboutcookies.org). For more information on enable or disable cookies in the most frequently used browsers, please refer to these websites:

- Apple Safari: <https://support.apple.com/hu-hu/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=hu>
- Microsoft Internet Explorer: <http://windows.microsoft.com/hu-hu/windows-vista/block-or-allow-cookies>
- Opera: <https://www.opera.com/help/tutorials/security/privacy/>
- Mozilla Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>

### Your rights regarding the Data Processing carried out by Us

You have various rights with respect to our use of your Personal Data:

- **Right to access:** you have the right to request from us access to your Personal Data processed by us and obtain information regarding the purpose of processing, what categories of Personal Data are processed, for or towards who we are transferring or disclosing your Personal Data, for what period we are processing your Personal Data, your rights in connection with Data Processing carried out by us regarding your Personal Data, Additionally, in the case we collect your Personal Data from other sources than from you, any available information as to the source and the categories of data collected. You also have the right to receive information on existence of automated decision-making and/or profiling we provide you with a copy of your Personal Data processed by us in case you require us to do so.
- **Right to rectification:** you have the right to request us to rectify your inaccurate Personal Data and to request us to complete your incomplete Personal Data by means of providing us with a supplementary statement.
- **Right to erasure:** we erase any of your Personal Data without delay if you request us to do so in the event of the following:
  - a) your Personal Data is no longer necessary for the concerning purpose;
  - b) you withdraw your consent and there is no other legal basis for the processing;
  - c) you object to the processing based on legitimate interests and there are no overriding legitimate grounds for the processing;
  - d) you object to the processing for direct marketing based on legitimate interests;
  - e) your Personal Data has been processed unlawfully;
  - f) your Personal Data has to be erased according to relevant laws.

Please note that we are entitled to not erase your Personal Data if it is necessary - among others - for exercising the right of freedom of expression and information, compliance with legal obligation, establishment, exercise or defense of legal claims.

- **Right to restriction of processing:** you have the right to obtain from us restriction of processing where one of the following applies:
  - a) you have contested the accuracy of your Personal Data, for a period enabling us to verify the accuracy of your Personal Data;
  - b) the processing is unlawful and you oppose the erasure of your Personal Data and request the restriction of their use instead;
  - c) we need no longer your Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims.

Where processing has been restricted, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.

- **Right to object to processing:** where Personal Data is processed for direct marketing purposes, you have the right to object at any time to the processing of Personal Data

concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You also generally have the right to object to the processing of Personal Data where the legal basis of the processing activity is our legitimate interest, or the legitimate interest of a third party.

- **Right to data portability:** you have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from us, provided that certain preconditions are met. You also have the right to have your Personal Data transmitted directly from us to another controller, where technically feasible.
- **Right to withdraw your consent:** if the processing is based on your consent then you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on your consent before its withdrawal.

We take actions requested in relation to exercising your above rights without undue delay and in any event within one month of receipt of Your request. This period may be extended by two months where necessary, with a reasoned notification to you, taking into account the complexity and number of requests.

In the event when you make such a request by electronic means, we provide you with information by electronic means where possible, unless you request otherwise.

In case we do not take any action regarding your request, we inform you as to the reasons within one month of receipt of your request. We take the necessary actions regarding exercising your rights in relation to the processing free of charge except when your request is manifestly unfounded or excessive.

In case we have reasonable doubts as to the identity of the natural person making the request, we may request additional information necessary to confirm the identity of such person.

In case you do not agree with AmCham's response to your request you can file complaint with the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, NAIH, [www.naih.hu](http://www.naih.hu), phone: +36 1 391 1400, fax: +36 1 391 1410, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

### **Miscellaneous**

Please note that we review this Privacy Policy from time to time and amend it as necessary. In case we amend this Privacy Policy, we announce and publish it by the usual means (e.g., via e-mail, or on the website). Nevertheless we encourage you to review this Privacy Policy occasionally.

Your right to lodge a complaint with a supervisory authority regarding the processing.