

Privacy Policy – WOKEBUSTERS

The website www.cpachungary.com (hereinafter: Website) is owned by Jogállam és Igazság Nonprofit Korlátolt Felelősségű Társaság (registered office: 1121 Budapest, Budakeszi út 36/C.; company registration number: 24375223-2-43; hereinafter: JIN Kft. or Data Controller). The Website is operated by Art Supreme Korlátolt Felelősségű Társaság (registered office: 1085 Budapest, Röck Szilárd utca 11. IV. em. 26.; company registration number: 01-09-353968; hereinafter: Company) on behalf of JIN Kft.

The original purpose of the Website was to provide the possibility to register for the event "CPAC Hungary" (hereinafter referred to as "the Event") which took place between 25-26th April 2024 jointly organized by the American Conservative Union Foundation (registered office: 1199 N Fairfax St, Suite 500, Alexandria, VA 22314, United States of America; phone: +1 (202) 347-9388; email: contact@conservative.org) and the JIN Kft. The „Center for Fundamental Rights” and the „Alapjogokért Központ” trademarks appearing on the Website are registered with the EUIPO as European Union trademarks and owned exclusively by JIN Kft.. "WOKEBUSTERS" initiative (hereinafter referred to as "WOKEBUSTERS") was announced at the Event. Now as an additional purpose, the Website provides the opportunity to publicly support the WOKEBUSTERS – via the Website, other websites of the Data Controller, the Data Controller's social networking sites and in the Data Controller's press releases and press statements – and to ensure the possibility for the Data Controller to contact the registrants and to reconnect with them.

On the Website, by clicking on the WOKEBUSTERS menu (hereinafter "menu"), the list of persons can be displayed who, either at the Event or afterwards, have shared the values (announced and since referred to collectively under the catchword WOKEBUSTERS) expressed by the Data Controller and the speakers during and since the Event. The purpose of this menu is to promote the commitment to these shared values, to identify the persons who have joined this commitment and to allow third parties to join. Those who register themselves through the menu as WOKEBUSTERS supporters will become WOKEBUSTERS members in a figurative sense, and the Data Controller will disclose this fact on its Website, on its social media sites, in its press releases and press statements, based on their consent.

1. Acceptance of the Privacy Policy

Registration as a WOKEBUSTERS member on the registration panel accessible through the menu is subject to your explicit consent to the processing and making public of your data in accordance with this Policy. By checking the box *"I have read and accept the Privacy Policy and I consent to the processing of my data provided during registration in accordance with the Privacy Policy."* you declare that you have read the contents of this Policy and give your explicit consent to processing and making public your personal data as specified in this Policy.

2. Definition of the Data Controller

2.1. The controller of your personal data is JIN Kft., which carries out data processing activities in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: GDPR) and Act CXII of 2011 on the right of informational self-determination and freedom of information (hereinafter: Info Act).

2.2. You can contact the Data Controller at the following addresses:

- by mail: 1121 Budapest, Budakeszi út 36/C.;
- by email: registration@cpachungary.com;
- by phone: +3613294924.

2.3. Representative of the Data Controller: Dr. Miklós Géza Szánthó, Managing Director.

3. Legal Basis of Data Processing and Publication of Data

The legal basis for processing, and making public your personal data is your consent (Article 6(1)(a) of the GDPR). Regarding special categories of personal data under Article 9(1) of the GDPR (your political opinion regarding WOKEBUSTERS), the legal basis for processing such data shall be your explicit consent (Article 9 (2) (a) of the GDPR).

By registering through the menu of the Website, you give explicit consent to the Data Controller to process and to make public the following data: your name and your political opinion as a supporter of the WOKEBUSTERS initiative of the Data Controller, as indicated above.

4. Purpose of Data Processing and Publication of Data

The purpose of the data processing is to promote the values and messages (announced and since referred to under the WOKEBUSTERS catchword) of the Event to a wider audience.

In this context, the purpose of the public disclosure of data for the Data Controller is to promote to the public the values expressed by the speakers and the Data Controller at the event, and to invite third parties to stand up for them. In doing so, the Data Controller shall publish, at any time and on any medium (the Website, the Data Controller's own website, electronic and print media, audiovisual media, social media, etc.), the list of the persons supporting the WOKEBUSTERS initiative, and shall highlight individually those persons whom it wishes to name as supporters in its current statement. In doing so, the Data Controller will make public their names and political opinions in connection with their support for the above-mentioned initiative in the aforementioned media and platforms.

In relation to the promotion of the WOKEBUSTERS initiative on social media, the purpose of the processing is to present it to a wider audience.

The purpose of data processing is also to keep a record of the supporters of the WOKEBUSTERS initiative - including their names, contact details, institutional affiliation and position - in order to send them invitations to future events, to call them up publicly to react, to contact them via the contact details provided in order to request their cooperation, statements and opinions.

The purpose of the processing is also to provide information about the results of the Event and the organisation of similar events to the participants, to potential participants of future similar events and to the general public.

5. Presence On Social Media Platforms and Joint Data Controllers

In cases where processing, including the disclosure of data, is carried out through a social media platform in order to achieve the above purposes, the Data Controller and the media platform provider shall be considered as joint controllers by virtue of the underlying legal relationship between them.

For the purposes stated above, the Data Controller uses Messenger, Facebook, Instagram, (all the preceding three platforms being the products of Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; hereinafter "Meta Ireland"); Youtube (provided by Google) and X (provided by X Corp). For your personal data transferred to any of the Data Controller's pages on social media sites (e.g. a picture containing your image uploaded on JIN Kft's Facebook page), the Data Controller and Meta Ireland for Messenger, Facebook, Instagram; the Data Controller and Google for Youtube; the Data Controller and X Corp for X are considered as joint controllers of the joint processing ("Joint Processing") in application of Article 26 GDPR by virtue of the underlying legal relationship between them. The same applies to your activities carried out on the Data Controller's pages (e.g. liking a Facebook post). The information on Meta Ireland's processing required by Article 13(1)(a) and (b) GDPR can be found in Meta Ireland's Privacy Policy at <https://www.facebook.com/about/privacy>; Google; X Corp processing required by Article 13(1)(a) and (b) GDPR. The same information relating to Youtube can be found in Google's Privacy Policy at <https://policies.google.com/privacy?hl=en>. The same information relating to X can be found in X Corp's Privacy Policy at <https://twitter.com/en/privacy>. The purposes for which the collection and transmission of personal data that constitutes the joint processing takes place are the same as those stated above. Further information on how Meta Ireland; Google; and X Corp process personal data, including the legal basis Meta Ireland; Google; and X Corp rely on and the ways to exercise Data Subject rights against Meta Ireland, Google and X Corp can be found in Meta Ireland's Privacy Policy at <https://www.facebook.com/about/privacy> Google's Privacy Policy at <https://policies.google.com/privacy?hl=en>; X Corp's Privacy Policy at <https://twitter.com/en/privacy>. The Data Controller and Meta Ireland entered into the Controller Addendum available at https://www.facebook.com/legal/controller_addendum to determine the respective responsibilities for compliance with the obligations under the GDPR with regard to the Joint Processing. The Data Controller and Meta Ireland have agreed that JIN Kft. is responsible for providing Data Subjects as a minimum with the information provided above, and that Meta Ireland is responsible for enabling Data Subjects' rights under Articles 15-20 of the GDPR with regard to the Personal Data stored by Meta Ireland after the Joint Processing. The Data Controller and Google; the Data Controller and X Corp have entered into the Controller Addendum by virtue of the underlying legal relationship between them (see at: <https://policies.google.com/privacy?hl=en>; <https://twitter.com/en/privacy>).

6. Scope of Personal Data Processed and disclosed

6.1. The Data Controller requests specific personal data during the use of the registration interface on the Website menu. The following personal data are requested during registration:

- name (for identification purposes)

- email address (for notifications)
- institution and position (for identification purposes)
- political opinion (in connection with their support of the WOKEBUSTERS initiative)

In order to promote the WOKEBUSTERS initiative the Data Controller shall make public the following data:

- name (for identification purposes)
- political opinion (in connection with the support of the WOKEBUSTERS initiative)

6.2. In the case that you, as a speaker at the event, have signed, initialled and/or provided your own message (hereinafter collectively referred to as "writing") on the Wall of WOKEBUSTERS marked with the header "We, the Wokebusters of CPAC Hungary[...]" provided to the speakers, the Data Controller may, in addition to the data referred to in subsection 6.1., also process your personal data encompassing the image of your writing as described above and you give consent to the Data Controller to make such data public by publishing a photograph and/or video of the Wall of WOKEBUSTERS displaying your writing.

7. Your Institution and Your Position

By registering through the menu, you declare that the information you have provided is true and correct in relation to your institution and the position you hold in that institution.

8. Duration of Processing and Public Disclosure of Data

The Data Controller processes and discloses publicly the personal data provided by you during registration until withdrawal of your consent. After the withdrawal of consent, the Data Controller will delete your personal data from its database and the list published under the Website menu without undue delay, which means five working days at the latest.

9. Your Rights Regarding Personal Data Processed and Disclosed by the Data Controller

9.1. Right of Access [Article 15 of the GDPR]: You have the right to receive feedback from the Data Controller on whether it is processing any of your personal data and, if so, to be informed of the purposes of the processing, the categories of personal data stored, the duration of the storage of the data and your rights in relation to the processing. Under this right, you may request that a copy of the personal data processed be provided to you, however this must not adversely affect the rights of others.

9.2. Right to Rectification of Processed Data [Article 16 of the GDPR]: Under the right of rectification, you may request the Data Controller to rectify inaccurate personal data concerning you without undue delay and to complete incomplete personal data, taking into account the purposes of the processing.

9.3. Right to Erasure of Processed Data ("Right to Be Forgotten") [Article 17 of the GDPR]: In the event that the Data Controller has unlawfully processed your personal data, you may request the Data Controller to delete the relevant personal data without undue delay. If the processing of your personal data is no longer necessary, the Data Controller shall automatically delete them on the grounds that

the purpose of the processing has ceased to exist, at the latest after the expiry of the time limit specified for the processing. Where the Data Controller has made the personal data public and is obliged to erase the personal data, the Data Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The right to be forgotten does not apply, i.e. the Data Controller does not delete the data if the processing is necessary:

- for the exercise of the right to freedom of expression and information;
- to fulfil an obligation imposed on the Data Controller or to carry out a task carried out in the public interest;
- on grounds of public interest in the field of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
- for the establishment, exercise or defence of legal claims.

9.4. Right to Restriction of Processed Data [Article 18 of the GDPR]: You have the right to request the Data Controller to restrict the processing of your personal data if one of the following conditions is met:

- a) you dispute the accuracy of your personal data (in this case, the restriction applies for the time necessary for the Data Controller to verify the accuracy of the personal data);
- b) the processing is unlawful, and you oppose the deletion of the data and instead request the restriction of their use;
- c) the Data Controller no longer needs your personal data for the purpose of processing, but you require them for the establishment, exercise, or defense of legal claims; or
- d) you have objected to the processing of your data for reasons related to your particular situation (in this case, the restriction applies for the time necessary to verify whether the legitimate grounds of the Data Controller override yours).

9.5. Right to Data Portability [Article 20 of the GDPR]: You have the right to receive the personal data provided to the Data Controller, based on your consent, in a structured, commonly used, machine-readable format, and you have the right to transmit this data to another controller without hindrance from the Data Controller.

9.6. Right to Withdraw Consent [Article 7 of the GDPR]: You have the right to withdraw your consent to the processing of your personal data at any time concerning the processing based on consent, but this does not affect the lawfulness of the processing carried out before the withdrawal. To withdraw your consent, for identification purposes, please contact the Data Controller from the email address you provided to the Data Controller writing to registration@cpachungary.com. Upon withdrawal of consent, the Data Controller will without undue delay, but within 5 working days at the latest arrange for the deletion of your personal data.

10. Data Controllers and Data Processors

In addition to designated employees of the Data Controller, personal data may be accessed by the designated employees of the Company entrusted by the Data Controller with the operation of the Website. The above personnel may only access personal data for the performance of their duties, and they have undertaken a confidentiality obligation regarding the data they become aware of. The Company qualify as data processor, performing its activities on behalf and in the interest of the Data Controller. The Data Controller only engages data processors that provide adequate guarantees to ensure compliance with legal requirements for data processing and the protection of the rights of data subjects through appropriate technical and organizational measures.

The Data Controller has made every reasonable effort to ensure that the data it processes is not accessible to unauthorized parties.

However, JIN Kft. advises visitors about the Website that when playing embedded YouTube videos, cookies used by YouTube may be installed, which may store personal data available to the operator of YouTube or another company, if applicable.

11. Remedies

You are entitled to contact the Data Controller at the provided contact details at any time to assert your rights related to the processing of your personal data. The Data Controller will take the necessary measures in response to inquiries immediately, but no later than within 30 days, and will inform you accordingly. If you find the response from the Data Controller unsuccessful or believe that the Data Controller has restricted the enforcement of your rights, you may initiate an investigation by the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH) (registered office: 1055 Budapest, Falk Miksa utca 9-11., phone: +3613911400; email: ugyfelszolgalat@naih.hu), or you may initiate an administrative procedure by the NAIH or go to court in the event of a violation of the legal provisions regarding the processing of your personal data.