# Privacy Policy

Association of Socially Beneficial Investors

Effective date: 2025-05-22

## 1. Introduction

The Association of Socially Beneficial Investors (hereinafter: “Controller”) is committed to the protection of personal data and fully complies with applicable data protection legislation, in particular:
- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR),
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.).

This policy aims to provide transparent and detailed information to natural persons (hereinafter: “Data Subjects”) about the processing of their personal data.

## 2. Purposes, Legal Bases and Duration of Data Processing

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| Purpose | Data Processed | Legal Basis | Duration |
| Newsletter subscription | name, email address | GDPR Article 6(1)(a) – consent | Until consent is withdrawn |
| Event registration | name, contact details, workplace | GDPR Article 6(1)(a) | 1 year after the event |
| Membership registry | name, address, birth data, mother’s maiden name | GDPR Article 6(1)(b) and (c) | 5 years after membership ends |

## 3. Consent Management

Consent can be withdrawn at any time by sending an email to adatkezeles@thbe.hu. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

## 4. Data Recipients and Processors

The Controller does not disclose personal data to third parties unless:
- required by law, or
- the Data Subject has given explicit consent.

Email newsletters are sent using the MailChimp service provider (as data processor). This service is compliant with GDPR and stores data on servers located in the USA under the EU-U.S. Data Privacy Framework.

## 5. Rights of Data Subjects

Data Subjects have the right to:
- request information about the data processed,
- access their data,
- request rectification or erasure (right to be forgotten),
- request restriction of processing,
- object to the processing of their data,
- exercise the right to data portability (GDPR Article 20).

Requests can be submitted to:
Email: adatkezeles@thbe.hu
Postal address: 1052 Budapest, Piarista köz 2.

## 6. Complaints and Legal Remedies

Data Subjects have the right to lodge a complaint with the supervisory authority:

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)
Address: 1055 Budapest, Falk Miksa utca 9-11.
Website: https://www.naih.hu
Email: ugyfelszolgalat@naih.hu
Phone: +36 1 391 1400

## 7. Technical and Organizational Measures

The Controller implements appropriate security measures to protect personal data, particularly:
- preventing unauthorized access,
- ensuring data integrity and availability,
- maintaining confidentiality.