

Privacy and Data Processing Policy for Newsletter Subscriptions

With regard to the data recorded, the Controller is **MATFIN Foundation** (registered seat: 1093 Budapest, Czuczor utca 2-10., 2. emelet, company registration number: 01-01-0013793, tax number: 19414511-2-43, email: contact@matfin.org).

1. Name and contact details of the Data Protection Officer

The Data Protection Officer of MATFIN Foundation is Marcell Németh, postal address: 1093 Budapest, Czuczor utca 2-10., 2. emelet, email: contact@matfin.org.

Please note that only employees of the Controller involved in this job or authorised have access to your personal data to the extent necessary, within the scope of the performance of their duties.

The Controller does not transfer personal data to third parties, with the exception of the provision of data on the basis of a legal obligation (e.g., court, investigative authority, prosecutor's office, etc.).

Please note that the Controller does not process any data about you other than those listed above, and its employees are bound by confidentiality obligations with regard to all information. The Controller does not process personal data that it does not collect from the data subject.

Your personal data is processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 17 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation) and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Freedom of Information Act).

2. The purpose of the processing

2.1 Sign-up for electronic newsletter

Data subjects	Subscribers to newsletters Those entitled to access the personal data are the employees of MATFIN Foundation, as employer, who perform tasks related to the sending of newsletters, as well as the Data Processors.
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The purpose of the processing	Sending email newsletters containing information about the activities of MATFIN Foundation, in particular on its publication Matphin – High School Journal of Mathematics, Physics and Informatics (hereinafter: Matphin) to the email address of the subscriber (hereinafter: Subscriber). The MATFIN Foundation may send newsletters to the email address provided by the Subscriber at a frequency determined at its discretion, typically once every 1 to 3 months.
Legal basis for processing	Voluntary consent of the data subject, Article 6(1)(a) GDPR.
Data processed	Email address
Deadline for deletion of the data	The data provided will be processed by MATFIN Foundation until the Subscriber prohibits the use of the data for such purposes by unsubscribing. You can unsubscribe from the newsletter by clicking on the link “Unsubscribe” at the bottom of the newsletter. Personal data will be deleted within 10 working days of receipt of the request. The data will also be deleted when the purpose of the processing ceases to exist.

2.2 Sign-up for newsletter

Data subjects	Subscribers to newsletters Those entitled to access the personal data are the employees of MATFIN Foundation who perform tasks related to the sending of newsletters, as well as the Data Processors.
The purpose of the processing	Sending email newsletters containing information related to Matphin to subjects who subscribe to the newsletter and/or participate in research.
Legal basis for processing	Voluntary consent of the data subject, Article 6(1)(a) GDPR.
Data processed	Email address, technical information (IP address, cookie ID, browser type, device type, Google, Facebook IDs, source page), newsletter and notification message usage data (the date when the email is opened, device with which the email is opened, links clicked).

Deadline for deletion of the data	Within 10 working days of receipt of the request to that effect.
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3. Other processing activities

3.1 Statistical data

The data provided will be processed by MATFIN Foundation until the Subscriber deletes his or her registration or withdraws his or her consent.

The Controller may use the data for statistical purposes. The use of the data in aggregate statistical form shall not include any form of personal data that could identify the data subject.

3.2 Data recorded technically

The data recorded technically are the data of the Subscriber's accessing computer which are generated during the use of the service, and which are logged by the Controller's system as an automatic result of the technical processes (e.g., IP address, session ID). Due to the operation of the Internet, the data that is automatically recorded is automatically logged by the system without any special declaration or action by the Subscriber, by using the Internet. The Internet does not function without these automatic server-client communications. These data cannot be linked to other Subscriber personal data, except in cases required by law. Only the Controller is entitled to access the data. The log files, which are automatically and technically recorded during the operation of the system, are stored in the system for a period of time justified for the purpose of ensuring the operation of the system.

3.3 Web analytics measurements

Google Tag Manager, as an external service provider, helps to independently measure website visits and other web analytics data. For detailed information on how the measurement data is processed, please visit <http://www.google.com/analytics>. Google Analytics data is used by MATFIN Foundation for statistical purposes only, to optimise the functioning of the site.

3.4 Information on the engagement of Processors

In the performance of its activities, MATFIN Foundation engages the Processors identified in this Policy. The Processor does not make any independent decisions, but is entitled to act solely

in accordance with the contract concluded with MATFIN Foundation and with the instructions received. MATFIN Foundation supervises the work of the Processors. The Processor shall be entitled to engage other processors only with the prior written consent of the Controller.

For the storage of your personal data, MATFIN Foundation uses the operating activities of **Rackhost Zrt.** (Address: 6722 Szeged, Tisza Lajos krt. 41., Customer Service: +36 1 445 1200, email: info@rackhost.hu), where the place of data storage is 6722 Szeged, Tisza Lajos krt. 41. Its task is to operate the web server.

The scope of the data accessed: the content of the websites on the domains and subdomains www.matfin.org and www.matphin.org, the emails sent to the email addresses based on these domains.

Furthermore, MATFIN Foundation will also use the services of **MailChimp – The Rocket Science Group, LLC** (675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA) **Google** (Analytics, Search Console) – **Google LLC** (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA).

4. Right of the data subjects

4.1 The right to request information (right of access)

Any data subject may request information from the Controller as to whether or not personal data concerning him or her are being processed, what data are being processed by the Controller, on what legal basis, for what purpose, from what source, for how long; to whom, when, under what law, to which personal data it has given access, or to whom it has transferred the personal data concerning him or her, including in particular to third country recipients or international organisations.

Please note that, in order to enforce the legal requirements relating to data security and to protect the identity of the data subject (“to whom the personal data relate”), in the course of the exercise of the right of information, access, inspection and when issuing a copy, the procedure is subject to identification in order to establish the identity of the person submitting the request and the data subject.

Information on your request must be sent without delay and within 30 days at the latest to the contact details provided.

4.2 Right to rectification

Any data subject may request that any of his or her data be amended or supplemented. Such a request shall be acted upon without delay and within a maximum of 30 days and information shall be sent to the contact details provided.

4.3 Right to erasure (right to be forgotten)

Any data subject may request the erasure of his or her data if

- a) his or her personal data are no longer necessary for the purposes for which they were processed by the Controller;
- b) the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no other legitimate grounds for the processing;
- d) the personal data concerning him or her have been unlawfully processed by the Controller;
- e) the personal data have to be erased for compliance with a legal obligation to which the Controller is subject;

4.4 Right of blocking and to restriction

Any data subject may request the blocking of his or her data if

- a) the accuracy of the personal data is contested by the data subject, in which case the blocking/restriction applies for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing; in this case the restriction applies for a period until it is established whether the legitimate grounds of the Controller override those of the data subject.
- e) The blocking lasts as long as the reason stated makes it necessary to store the data. Upon request, this must be done without delay and within a maximum of 30 days, and information shall be sent to the contact details provided.

4.5 Right to object

Any person shall have the right to object to processing which is based on legitimate interest using the contact details provided. In such a case, the Controller may no longer process the personal data unless the Controller demonstrates that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or which are related to the establishment, exercise or defence of legal claims. The objection must be examined within the shortest possible time from the date of the request, but within a maximum of 15 days, a decision shall be taken on the merits thereof, and the decision shall be communicated to the contact details provided.

4.6 Right to data portability

The data subject shall have the right to request from the Controller to receive personal data concerning him or her, which the data subject has provided to the Controller on the basis of his or her consent, in a structured, commonly used, machine-readable format, and shall also have the right to transmit such data to another controller, where the processing is based on the data subject's consent or on a contract and the processing is carried out by automated means. In exercising his or her right to data portability, the data subject shall have the right to request, where technically feasible, the direct transfer of personal data between controllers.

The Controller shall comply with the data subject's request within a maximum of 30 days and shall notify the data subject thereof by sending a letter to the contact details provided by the data subject.

Consent may be withdrawn at any time, but the withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal.

The data subject may lodge a complaint directly with the **National Authority for Data Protection and Freedom of Information** (in Hungarian: Nemzeti Adatvédelmi és Információszabadság Hatóság; address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; phone: +36- 1-391-1400; email: ugyfelszolgalat@naih.hu; website: www.naih.hu).

In the event of a breach of the data subject's rights, the data subject may initiate court proceedings against the Controller. The court shall rule on the case in priority proceedings. The data subject may, at his or her option, bring the action before the court competent for his or her place of residence or place of stay.

The Controller shall inform the data subject without undue delay and at the latest within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The

obligation to provide information can be ensured by the operation of a secure online system through which the data subject can easily and quickly access the necessary information.

Budapest, 1 July 2026

By subscribing to the newsletter, I have acknowledged the Data Protection Policy, and I consent to MATFIN Foundation processing my personal data provided by me for the purpose of subscribing to the newsletter in accordance with the terms of the Data Protection Policy.