

## PRIVACY POLICY AND DATA PROCESSING NOTICE

### 1. Clarification of the controller and details of the Data Protection Officer

The website registered under the [www.okkozpont.hu](http://www.okkozpont.hu) domain address (including the Foundation's homepage and the Platypus Portal) is maintained & operated by the OTP Fáy András Foundation (headquartered in 1051 Budapest, Nádor u. 16.; fiscal code: 18014008-1-41; registration code: Pk.68245/1992/14; serial no.: 01-01-0003024; hereinafter referred to as the "Operator"). The present Data Processing Notice (hereinafter: "Notice") contains the rules governing the processing of personal data by the Operator in connection with the operation and maintenance of the Portal.

Name and contact details of the Operator's Data Protection Officer:

Zoltán Borsi  
Phone no.: +3630/241-5161  
E-mail: [adatvedelem@okkozpont.hu](mailto:adatvedelem@okkozpont.hu)

By beginning the use of this Portal, Users consent to the terms of this Notice. This Notice is continuously made available on the homepage of the Portal.

### 2. Data processing of applications available from the App Store and Play Store

The present Privacy Policy and Data Processing Notice states that the AR (Augmented Reality) applications downloadable free of charge from the *Play Store*, in the case of *Android* phones, and from the *App Store*, in the case of *iPhone*, namely:

- *BanKing Card Game*
- *Thematic Ninja Tour*
- *History of Money AR Adventure Tour*
- *OTP Fáy András Framework Application*

**do not request, store, use, or process any personal data! Their use does not require registration!**

### 3. Definitions

**Personal Data**: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**Processing**: 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;

**Controller**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**Data Processor**: the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**Third Party**: the natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

**Consent of the Data Subject**: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

The capitalized terms used herein and otherwise not defined elsewhere have the same meaning as the capitalized terms defined in the Terms of Service ("ToS") of the Portal and are furthermore consistent with the definitions listed under Article 4 of the GDPR. The present Notice is part of the ToS.

#### **4. Principles relating to processing of personal data**

The Operator processes personal data in accordance with the following laws:

- (a) Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter: "Privacy Act");
- (b) 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”);

- (c) Act CVIII of 2001 on certain issues of electronic commerce services and information society services (hereinafter: “E-Commerce Act”);

The Operator shall take appropriate measures to ensure that Personal and other data relating to Users will always be

- (a) processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimization);
- (d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, with regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for statistical purposes subject to implementation of the appropriate technical and organisational measures (‘storage limitation’);

Furthermore, processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

## 5. The purpose, duration and scope of data processing

- (a) **Platypus: A Finlit Story registration (application és webpage):**

Platypus: A Finlit Story game application is available both on the website and for free download and use from the App store and Play Store, where the necessary registration for all access usage can be completed the following way.

The following information is requested on the registration screen:

Surname, first name, optional username (a pseudonym is advised), year and month of birth. The location and name of the school can be selected from a built-in database (drop-down list). To complete the registration the User must provide a working email address and an adequately secure password of at least 8 characters!

You can also sign-up using your Instagram or Google account.

**We request that the above data be submitted directly by the User (the data subject) during the registration process, with legal basis defined under Article 6 (1) (a) of the GDPR as ‘subject consent’ whereby the user voluntarily consents to the processing of his or her personal data for one or more specific purposes.**

**Pursuant to Article 8 (1) of the GDPR, the processing of the personal data of a child below the age of 16 years shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child!**

**Those children who are aged 16 or above can provide their own consent without parental authorization!**

Personal information requested during registration is required for the User’s account to have full access to all features and services of the game, and to participate, alone or with others, in the acquisition of valuable souvenirs and community programs on the Adventure store!

The Controller ensures the security of the personal data provided during registration, and shall not use the data for any other purpose, nor disclose the data to third parties

#### **How to register:**

- Fill out the ‘*Create Account*’ page with the requested information.
- Check in the box: I have read the Privacy Policy
- Click on the ‘*Create Account*’ button

Following, the website will inform the User on the following:

- Download the Platypus mobile game on your iOS or Android phone!
- Obtain during the game as many synthetic sushi as you can!
- Upload to the Portal the synthetic sushi you obtained in the game using the in-app sushi transport feature!

During the game players can obtain so-called sushi (points) that can be used to bid on various souvenirs and fun community programs through the Portal (Adventure Store). In the case of a successful bid, the Operator has to ensure before handing out the prize, that the student applying for the prize is the same person that won the prize on the auction, or purchased it in the virtual store with his/her points. This process requires the student to temporarily upload his/her student ID card. Once uploaded, and admin

will perform the validation, and subsequently delete the uploaded image permanently from the system, which will no longer be stored for data processing!

**The most important step for Users under the age of 16 is to download the parental consent document, which must be filled in and signed by the parents and then uploaded to the Portal. Otherwise, Users under the age of 16 will not have access to the profile!**

A confirmation email will be sent to the provided email address during registration. Registration will be completed when the email address is confirmed by clicking the button in the email. This step is also required to have full access to the user account!

The **purpose of the data processing** is therefore to provide a complete experience for the Users (playing with the application, bidding for souvenirs, learning new skills, in short: obtaining valuable skills while playing an online game). This requires the registration of a user account, and the provision of essential personal data, which will be handled with due care and strict security, as defined by the GDPR!

#### **Duration of data processing**

The User and account details provided during registration will be processed by the Data Processor (Operator) until the existence of the respective account. Within the account, the User can modify his/her own data or request the deletion of the account from the Data Processor.

#### **(b) Applying for a training, event, or the submission of a competition entries on the Foundation's website:**

The website gives visitors the opportunity to apply for trainings, events and submit their entries online for the competitions announced by the OTP Fáy András Foundation.

#### How to apply for a training:

Users can view our current trainings on our Website by clicking on the Trainings menu, where they will find further information on the trainings and apply immediately by clicking the APPLY button. Applications can also be submitted through the CONTACT menu, by clicking the Apply for training option as well. The following information is required to successfully apply to a training:

- The name of the training selected from the drop-down list
- The applicant must provide his or her own name
- Whether the application is submitted by the teacher or parent
- An email address and phone number is required, so our education organisers our trainers can reach the applicant to continue the administration process
- The age group of candidates(s)

- The number of candidates
- The name of the institution (school)
- Comment field can be optionally filled in
- It is also possible to upload files up to 25MB in size
- Before clicking the Submit Application button, please check in the box “I accept the Privacy Policy” (consenting to the processing of your personal data) and confirm that you are not a robot

The processing of personal data (name, e-mail address and telephone number) submitted during application is lawful based on the legal basis of ‘subject consent’, as defined in Article 6 (1) (a) of the GDPR.

The period of data processing lasts until the end of the training, after which the registered data is duly deleted. If interested in new trainings, Users must apply again via the website.

**IMPORTANT!** Only teachers or parents can apply for the trainings, children (especially those under 16) cannot apply on their own!

#### How to register for an event:

Users can view our upcoming events on our Website by clicking on the Events menu, where they will find further information on the events and register immediately by clicking the INTERESTED IN THE EVENT button. Registrations can also be submitted through the CONTACT menu, by clicking the Register for event option as well. The following information is required to successfully register for an event:

- The name of the event selected from the drop-down list
- The applicant must provide his or her own name
- The number of people registering for the event
- An email address and phone number is required, so our education organisers can reach the applicant to continue the administration process
- The name of the institution (school)
- Comment field can be optionally filled in
- Before clicking the Submit Registration button, please check in the box “I accept the Privacy Policy” (consenting to the processing of your personal data) and confirm that you are not a robot

The processing of personal data (name, e-mail address and telephone number) submitted during application is lawful based on the legal basis of ‘subject consent’, as defined in Article 6 (1) (a) of the GDPR.

The period of data processing lasts until the end of the event, after which the registered data is duly deleted. If interested in new events, Users must apply again via the website.

**IMPORTANT!** Only teachers or parents can register for events, children (especially those under 16) cannot apply on their own!

#### How to submit entries for a competition:

Users can view our current competitions on our Website by clicking on the Competitions menu, where they will find further information on the competitions and submit an entry immediately by clicking the SUBMIT ENTRY button. Entries can also be submitted through the CONTACT menu, by clicking the Submit and entry option as well. The following information is required to successfully submit an entry for a competition:

- The name of the competition selected from the drop-down list
- The applicant must provide his or her own name
- The name of the institution (school)
- An email address and phone number is required, so our education organisers can reach the applicant to continue the administration process
- Comment field can be optionally filled in
- It is also possible to upload files up to 25MB in size
- Before clicking the Submit Entry button, please check in the box “I accept the Privacy Policy” (consenting to the processing of your personal data) and confirm that you are not a robot

The processing of personal data (name, e-mail address and telephone number) submitted during application is lawful based on the legal bases of ‘subject consent’, as defined in Article 6 (1) (a) of the GDPR.

The period of data processing lasts until the end of the competition, which includes the evaluation process and announcement of the results, after which the registered data is duly deleted.

**IMPORTANT!** Only teachers or parents can register for events, children (especially those under 16) cannot submit entries on their own!

#### **6. Who has access to the processed data?**

Primarily the administrators and partly the Foundation’s education and event organisers.

#### **7. Data processing and data security:**

There is a collaboration and data processing agreement between OTP Fáy András Foundation and Google Ireland Ltd. This entails the storage of online data in Google's Frankfurt Data Center (Google Germany GmbH). As the Frankfurt Data Center is located geographically within the EU, it is naturally subject to the regulations of the GDPR, which the Data Center is fully compliant with. As a member of the Google Group, the Frankfurt Data Center only transmits, stores and calculates data through computing devices, and has no direct access to the data except at the customer's request!

Google's GDPR Terms and Conditions can be found at the following link in English:  
<https://cloud.google.com/security/gdpr/>

Google's data processing and privacy policy can be found at the following link in English:  
<https://cloud.google.com/terms/data-processing-terms>

Data security is implemented through hardware security solutions implemented in IoT systems. Working in conjunction with the Google Cloud Platform, Microchip implemented a JSON Web Token (JWT)-based authentication system based on Cloud IoT core and Microchip's ATECC608A CryptoAuthentication™, an ARM® Cortex®-M0 + based SAM D21 microcontroller, supported by the popular ATWINC1500 Wi-Fi® module.

**IMPORTANT! The use of the above AR applications are not dependent on the provision of personal data, the application do not request any data from the Users, and thus they do not process any data!**

## **8. Special stakeholder rights (withdrawal of consent)**

Under Article 7 (3) of the GDPR, the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

## **9. Data subjects' rights of redress relating to data processing**

The Operator shall provide Users with information on their processed personal data, and may request information on the Operator's data processing procedures, including requests for the prohibition of certain processes (e.g.: revocation of consent, rectification, deletion) at the following contact details:

- (a) E-mail: [info@otpfayalapitvany.hu](mailto:info@otpfayalapitvany.hu); [adatvedelem@okkozpont.hu](mailto:adatvedelem@okkozpont.hu)
- (b) Provisional postal address: 1072 Budapest, Rákóczi út 42., 8. emelet.

The User has the right

- (a) to obtain from the Operator, as the controller, confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: the purpose of the



processing, the categories of personal data concerned, copies of the processed data, etc.

Where personal data have not been obtained from the data subject, the controller shall provide the data subject with the following information:

the identity and the contact details of the controller and, where applicable, of the controller's representative, the purposes of the processing for which the personal data are intended as well as the legal basis for the processing, the categories of personal data concerned, the recipients or categories of recipients of the personal data, if any, where applicable, that the controller intends to transfer personal data to a recipient in a third country or international organisation. In addition, the controller shall provide the data subject the necessary information to ensure fair and transparent processing in respect of the data subject (e.g.: the period for which the personal data will be stored, the legitimate interests pursued by the controller or by a third party when the data is processed on this legal basis, the right to lodge a complaint, where the personal data originates from);

- (b) to request from the controller rectification or erasure of personal data;
- (c) to request, within certain limits, the erasure of personal data if, for example, it is no longer necessary for the purpose for which it was collected by the Operator or the User's consent to data processing has already been revoked. The User is also entitled to request the deletion of his/her personal data if the User has successfully opposed the processing of his/her personal data (see below), if the Operator has unlawfully processed the data, or if the Operator is obliged to delete the User's personal data. In certain cases, the Operator shall be entitled to refuse the request for cancellation, which shall be duly notified to the User;
- (d) to object to processing of personal data concerning him or her, if the Operator, or third party has legitimate interest when processing personal data, but the User believes that his/her rights, legitimate interests, fundamental freedoms take precedence over the legitimate interests of the Operator or a third party. The User may also object if the personal data is processed by the Operator for direct marketing, market research or profiling purposes;
- (e) to request the restriction of processing of personal data in cases, for example, the data processing is unlawful and the User opposes the erasure of the data;
- (f) to receive the personal data concerning him or her, which he or she has provided to a Operator, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller;
- (g) to withdraw consent to any data processing at any time when the processing of the User's personal data is based on the User's consent. It is important that the withdrawal of consent does not affect the lawfulness of the processing of data prior to the withdrawal of consent.

In the event of a violation of the rights of the affected User, it is advised to consult with the Operator and, and if failing to reach a consensus, or the User requests so, to request a hearing from the National Authority for Data Protection and Freedom of Information (NAIH) or to any other data protection authority or court competent in the Member State in which the User has habitual residence, workplace or where the suspected infringement took place.

Contact NAIH:

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

Phone number: +36 1 391 1400; fax: +36 1 391 1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: [www.naih.hu](http://www.naih.hu)

The controller shall provide any information relating to processing to the data subject, without delay, but the latest in a month after the submission of the request, in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in writing or by other means – including verbally upon request, provided there is valid proof of identification by the subject.

The information is free of charge, but if the request of the data subject is clearly unfounded or exaggerated, in particular due to its repetitive nature, the Operator may charge a fee of 3000 HUF under Article 12 (5) (a) GDPR.

## **10. Other Information**

In all cases, the Operator shall process the personal data of the Users in accordance with the applicable Hungarian and EU legislation, in particular the GDPR.

## **11. Modification of the Notice**

The controller reserves the right to unilaterally modify this Notice. The controller informs all affected individuals and entities about this change via a short notice on the Portal.