Marc Impact Programme Privacy Policy

effective from 01 July 2025

1. Introduction

Thank you for visiting the Marc Impact Programme (Marc programme) website. We take the protection of personal data very seriously when processing it, in accordance with the relevant legislation. The following policy provides you (hereinafter referred to as „customer", „data subject" or „user") with an overview of how we ensure data protection and for what purposes and what kind of data we process.

Marc is a unique programme for enterprise development boosting finance-readiness and social impact. The programme is available to businesses registered in Central and Eastern Europe, currently in Austria, the Czech Republic, Croatia, Hungary, Romania and Serbia.

The implementation of the Marc Programme is supported by the European Commission under the *EcoVolve: Evolutionizing Ecosystems for Social Enterprises in the CEE Region* grant programme.

The Marc Programme is implemented by IFUA Nonprofit Partner Public Benefit Nonprofit Ltd. (hereinafter referred to as IFUA NPP or Data Controller) and is managed, organized and implemented in close cooperation with SIMPACT Public Nonprofit Ltd (SIMPACT or Data Controller).

The IFUA NPP and SIMPACT implement the Marc programme in the participating countries through Local Partners, each of which is an independent data controller.

This Privacy Policy has been prepared in accordance with Articles 13 and 14 of 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation – General Data Protection Regulation (GDPR)).

2. Common controllers and their contact details

Name: IFUA Nonprofit Partner Public Benefit Nonprofit Ltd.

Headquarters: Budapest, Buda-part tér 2. 1117

Managing Director: Zsuzsanna Pál

Tax number: 14603204-2-43

E-mail address: **adatvedelem@nonprofitpartner.hu**

Name: SIMPACT Public Nonprofit Ltd.

Head office: 1048 Budapest, Járműtelep utca 23. 3. em. Door 7.

Managing Director: Nagy Gábor Lajos

Tax number: 25830024-2-41

E-mail address: **info@simpact.hu**

(together hereinafter referred to as Data Controller or Data Controllers)

The Data Controller responsible for data management issues is IFUA NPP.

The joint Data Controllers act as independent data controllers and process all personal data necessary for the application for and continued participation in the programme.

3. **Organizations supporting the programme**

Name: **ERSTE Foundation**

Name: **Erste Social Finance Holding**

Name: **ERSTE Group Bank AG**

Name: **European Commission**

The organisations supporting the Programme are the independent Data Controllers of all personal data necessary for the application and continued participation in the Programme.

4. **Other partners, financial organisations (independent data controllers) cooperating in the implementation of the Marc Programme:**

Name: **Erste Bank Austria** (Austria)

Name: **IMPACT HUB VIENNA** (Austria)

Name: **Erste&Steiermarkische Bank** (Croatia)

Name: **Česká spořitelna** (Czech Republic)

Name: **Startup Kitchen** (Czech Republic)

Name: **Erste Bank Hungary** (Hungary)

Name: **IFUA Nonprofit Partner Public Benefit Nonprofit Ltd.** (Hungary)

Name: **SIMPACT Public Nonprofit Ltd.** (Hungary)

Name: **BCR Social Finance** (Romania)

Name: **SYNERB Venture Catalyzer** (Romania)

Name: **Erste Banka Srbija** (Serbia)

Name: **Association for Affirmation of Culture** (Serbia)

Local partners, financial organisations process the data of impact businesses and organisations in their own country as independent data controllers. The data management information related to the activities of the local partners is available on the partners' websites.

5. **Scope of data processed, legal basis, purpose and duration of processing**

As a data controller, we process your personal data primarily for the purpose of evaluating applicants for the programme and making an informed decision on their admission to the programme. For participants who are admitted to the programme, the purpose of the

processing is also to provide them with the best possible professional support during the programme.

When you register, we will collect your name, e-mail address, password, company name, position – (mandatory) and LinkedIn contact – (optional) (scope of data processed).

The processing of your data is based on your consent (legal basis for processing). If you do not provide the mandatory scope of data above, we will not be able to accept your registration and provide access to professional content. In case of withdrawal of your consent, your registration and related personal data will be deleted immediately without undue delay and in an irreversible manner. You are entitled to notify us of your request for the deletion of your data and the withdrawal of your consent by sending an email to **adatvedelem@nonprofitpartner.hu**.

The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal. In the event of withdrawal of consent, the Data Controller shall not suffer any adverse legal consequences as a result of such withdrawal.

During the participation in the Marc Programme, images and audio recordings are made as mass recordings at the Programme events and activities, which are used by the Data Controller in the Marc Programme. Your data will be kept for 7 years after the end of the implementation of the Marc Programme (31.07.20256) (duration of data processing).

The website, the online platform (Babele) used to implement the Marc Programme, is operated by the following data processors:

- a WPViking Ltd., as website operator (company registration number: 09-09-026860, tax number: 25173749-2-09, registered office: 4200 Hajdúszoboszló, Kösialja u. 16.,
- a Cloudways Ltd. Junction Business Centre, as hosting provider (Adomain number: MT20765109, registered office: 1st Floor, Sqaq Lourdes, St Julian's SWQ 3334 Malta)
- and MailerLite Inc., MailerLite Limited, as a newsletter provider (Tax ID: GB 393734660, sregistered office: 71 Lower Baggot Street, Dublin 2, D02 P593, Ireland)
- Babele Create Together Srl. as Platform Provider (Company registration number is 33218665, Str Mitropolit Nifon, nr 13, sector 4, Bucharest, Romania)

Registration data are processed by data controllers and data processors using security technologies and procedures that comply with general data protection requirements. The Data Controllers and processors ensure that technological, physical, organizational and procedural safeguards are in place, meeting industry-accepted standards to protect the confidentiality, integrity, and availability of the processed personal data. In order to ensure the physical and software protection of the database server storing the data, the servers are located in a secure location (inaccessible to anyone).

The Data Controller may engage third-party services for the purpose of cleaning and updating available personal data, ensuring that such third parties' data management and processing practices comply with applicable legal requirements. The Controller ensures that no third party may use users' personal data for any purpose other than specified. By accepting this policy, users expressly consent to the processing of data by third parties for these purposes.

6. **Use of cookies**

The website uses cookie files (cookies) to enhance the user experience. These files are stored on your computer. The cookie- are not personally identifiable, they are necessary for the provision of our services and provide you with a superior user experience. Website users can disable cookies in their browser at any time.

The cookies allow us to generate statistics on, for example, the number of visitors per day, the most frequently visited pages and the time spent on them. This data allows us to better understand the needs of our visitors, so we can provide services that meet those needs. The data collected in this way will not be linked to any data that would identify you personally. This means that the visit is recorded, but the identity of the visitor remains unknown. We do not collect information about visitors' personal habits. We do not sell or rent log files stored on our servers, customer data, or personal information to anyone, including those linked to or advertised on our sites.

The use of cookies that are strictly necessary for the operation of the website (for the operation of the website, the use of the services and functions provided on the website) does not require the user's separate consent, because without the management of these cookies the website would not function.

If you enable cookies, the site may store details of the cookies (depending on the content of the page viewed):

- Pixel tracker (1.gif) cookie, used to count the number of sessions on the website to optimise CMP delivery
- HTTP cookie _cf bm, which useset to distinguish between humans and botsunk. This is useful for the website to produce valid reports on the use of the website.
- Cookie Consent stores the status of the user's consent to cookies for the current domain
- HTML Local Storage elementor cookie, used in conjunction with the WordPress theme of the website. The cookie allows the website owner to modify the content of the website in real time.
- The wpEmojiSettingsSupports cookie is part of a cookie suite used to serve and display content. The cookies will keep the correct state of the font, blog/image sliders, colour themes and other settings of the website.
- The _ga and _ga_# HTTP cookies are used by Google Analytics to send data about the visitor's device and behavior. They track the visitor across devices and marketing channels.

Although some information is automatically recorded as part of the operation of our websites, we do not currently use it for any purpose. Personal information, such as your telephone number, postal address, or other information, will only be provided to us if you voluntarily provide it to us when you complete the registration page. In this case, by providing your personal data, you consent to the processing of your data, you consent to the processing of your data and to the recording, processing, and use of your data.

7. **Data processing for newsletter purposes**

Your data will be used solely for the purpose of sending you our newsletters (professional news, content, training information); and to provide you with further information about the Marc programme and address any questions you may have about it.

We use your name and e-mail address to send you newsletters, and we also store the date of subscription and details of your consent to receiving the newsletter.

The processing is based on your consent (legal basis for processing), which allows us to send you newsletters. If you withdraw your consent or use the unsubscribe function available in the newsletter, your personal data will be deleted without undue delay (duration of processing).

After you unsubscribe, we will continue to store the date of unsubscription and your email address in a form protected by data protection rules in order to prove that you have unsubscribed and we will no longer send you newsletters, but we will not use your data in any other way.

8. Rights of the Data Subject in relation to data processing

During the period of data processing, the Data Subject shall have the following rights in accordance with the provisions of the Regulation:

- access to personal data and request for information on data processing
- right to rectification
- restriction of processing
- right to erasure
- right to object

If the Data Subject wishes to exercise these rights, identification of the Data Subject and communication with them will be necessary. Therefore, personal data will be required for identification purposes (however, identification may only be based on data that the Data Controller already processes).

The Data Controller shall respond to complaints about data management within 1 month at the latest.

This time limit may, if strictly necessary, be extended to 60 days if the request is complex and/or the number of requests justifies it, provided that the extension is notified to the Data Subject within the 30-day time limit, stating the reasons.

Information on the exercise of Data Subjects' rights will be provided to Data Subjects free of charge and at no cost.

Access to personal data and information

You have the right to receive confirmation as to whether your personal data are being processed and, if so, the right to:

- Obtain access to the personal data being processed
- Be informed of the following information
- The purposes of the processing

- The categories of personal data processed about the Data Subject
- Information about the recipients or categories of recipients to whom the Marc program has disclosed or will disclose personal data
- The envisaged period of storage of the personal data or, if not possible, the criteria used to determine that period
- The right of the Data Subject to request rectification, erasure, or restriction of processing of personal data concerning them, and the right to object to processing based on legitimate interests
- The right to lodge a complaint with a supervisory authority
- Where the data have not been collected from the Data Subject, any available information about their source
- The existence of automated decision-making (including profiling) and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the Data Subject

The purpose of exercising the right may be to ascertain and verify the lawfulness of the processing.

Marc Program ensures access to personal data by providing the personal data and information processed to the Data Subject in the form and by the means requested by the Data Subject after the Data Subject has been identified.

The Data Subject must indicate in the request whether he or she requests access to the personal data or information about the processing.

Where the Programme processes a large amount of information relating to the Data Subject, it may ask the Data Subject to specify which information or processing activities are covered by his or her request before providing the information.

Right to rectification

The data subject has the right to have inaccurate personal data relating to him or her corrected without delay at his or her request.

The Data Controller shall be exempted from this obligation if - accurate, correct or complete personal data are not available to it and are not provided by the Data Subject, or - the accuracy of the personal data provided by the Data Subject cannot be established beyond reasonable doubt. The above exemptions shall be documented by the Controller for the purpose of subsequent evidential verification.

Right to restriction of processing

The data subject shall have the right to obtain, at his or her request, the restriction of processing by the controller if one of the following conditions is met:

- The data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Controller to verify the accuracy of the personal data; if verification is not necessary, no restriction applies

- the processing is unlawful and the Data Subject opposes the erasure of the data and instead requests the restriction of their use
- the personal data are no longer necessary for the purposes for which they are intended to be processed, but the Data Subject requires them for the establishment, exercise or defence of legal claims
- The Data Subject has objected to the processing, but the Data Controller may also have a legitimate interest in the processing, in which case, until it is established whether the legitimate grounds of the Data Controller prevail over the legitimate grounds of the Data Subject, the processing shall be restricted

If the processing is restricted, such personal data, except for storage, may only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

The Data Controller shall inform the Data Subject in advance (at least 3 working days prior to the lifting of the restriction) of the lifting of the restriction.

Right to erasure – right to be forgotten

The Data Subject shall have the right to obtain the erasure of personal data concerning the Data Subject without undue delay by the Data Controller if one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected or processed by the Controller
- You withdraw your consent and there is no other legal basis for the processing
- The Data Subject objects to processing based on legitimate interest and there is no overriding legitimate ground (i.e. legitimate interest) for processing
- the personal data were unlawfully processed by the Controller and this has been established on the basis of the complaint
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Data Controller is subject

If, for any lawful reason, the Controller has disclosed the personal data processed about the Data Subject and the Controller is required to delete it for any of the reasons set out above, the Controller shall take reasonable steps, taking into account the available technology and the cost of implementation –, including technical measures –, to inform other controllers that process the data that the Data Subject has requested the deletion of the links to or copies of the personal data in question. As a general rule, the Data Controller does not disclose the personal data of the Data Subject.

Erasure does not apply where the processing is necessary:

- to exercise the right to freedom of expression and information
- to comply with an obligation under Union or Member State law that requires the controller to process personal data
- for the presentation, exercise or defence of legal claims

Right to object

You have the right to object to the processing of your personal data based on legitimate interests at any time on grounds relating to your particular situation. In this case, the Controller may no longer process the personal data, unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

Automated decision-making (including profile collection)

No automated decision-making (including profiling) takes place at the Data Controller.

Remedies available

If the Data Subject considers that the Data Controller has infringed a legal provision relating to data processing or has not complied with a request, he or she has the right to lodge a complaint in order to have the alleged unlawful processing stopped.

Without prejudice to any other administrative or judicial remedies, the Data Subject has the right to lodge a complaint with the NAIH if the Data Subject considers that the processing of personal data concerning him or her infringes the GDPR.

Contact details of the NAIH:

Name: National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf. 9.

Phone: +36 1 391-1400

Fax: +36 1 391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

The Controller hereby also informs the Data Subject that he or she may bring a civil action before a court. The court will decide the case out of turn.

Other information

Please be informed that if the Data Controller intends to carry out further processing of personal data for purposes other than those for which they were collected, the Data Controller will inform the Data Subjects of this other purpose and of all the information referred to above prior to the further processing.

Finally, please note that the above information obligation does not apply to the Data Controller if and to the extent that the Data Subject already has the information.

9. Data security

In the operation of the IT systems, the Data Controller shall ensure, by means of the necessary access rights management, internal organisation and technical solutions, that the Data Subject’s data cannot be obtained by unauthorised persons, and that unauthorised

persons cannot delete, extract from the system or modify the data. The Data Controller shall also enforce the data protection and data security requirements against its data processors.

The Data Controller keeps records of any data protection incidents and, if necessary, informs the Data Subject of the incidents that occur.

10. Other provisions

The Data Controller reserves the right to amend this Privacy Policy in a way that does not affect the purpose and legal basis of the processing.