



DATA PROTECTION INFORMATION

in which we inform you, as a visitor to our website and user of our services, about our company's data management and data protection rules.

1. What principles do we follow in our data processing?

Our institution follows the following principles in its data processing:

- a) We process personal data lawfully, fairly and in a transparent manner.
- b) We collect personal data only for specific, clear and lawful purposes and do not process it in a manner incompatible with those purposes.
- c) The personal data we collect and process is adequate and relevant for the purposes of data processing and is limited to what is necessary.
- d) Our institution takes all reasonable measures to ensure that the data we process is accurate and, where necessary, kept up to date, and we delete or correct inaccurate personal data without delay.
- e) We store personal data in a form that allows you to be identified only for as long as is necessary to achieve the purposes of the processing of personal data.
- f) We use appropriate technical and organisational measures to ensure the security of personal data against unauthorised or unlawful processing, accidental loss, destruction or damage.

Our institution processes your personal data

- a) on the basis of your prior information and voluntary consent, and only to the extent necessary and in each case for a specific purpose, i.e. we collect, record, organise, store and use your personal data.
- b) In certain cases, the processing of your data is based on legal requirements and is mandatory (e.g. monitoring by the TEMPUS Public Foundation as a sponsor). In such cases, we will draw your attention to this fact.

- c) In certain cases, our Company or a third party has a legitimate interest in processing your personal data, for example, for the operation, development and security of our website.

2. Who are we?

Cogito Foundation Headquarters: 1064 Budapest, Rózsa u. 64. I.1/b.

Our locations:

Day Care Centre and Day Hospital for Psychiatric Patients

1165 Budapest, Zsenge u. 33.

www.fonix.co.hu

Psychiatric and Psychotherapy Outpatient

Clinic 1165 Budapest, Nyílhegy u. 4.

www.cogitomed.hu

PATH Project

1165 Budapest, Zsenge u. 33.

www.onthepath.eu

Contact

Postal address: 1165 Budapest, Zsenge utca 33. Telephone number: 06-30-370 1376

Our email address: info@onthepath.eu

Tax number: 18524150-1-42

Company registration number: Budapest District Court: 13-01-0003618

Contact details of our company's data protection officer (e-mail address):

cogitoalapitvany.budapest@gmail.com

In order to provide high-quality service to our customers, our company uses the following data processing methods when handling data:

NAME	ADDRESS	ACTIVITY
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BlazeArts Kft. (forpsi.hu)	1095 Budapest, Soroksári út 110–112.	Web hosting services, server operation
Dávid Attila Gál ev.	Hungary	Website maintenance, development, technical operation ¹

If we modify the scope of our data processors, we will reflect the changes in this notice.

Data processed by us (The data retention period is determined on the basis of the relevant legislation and the period necessary for the enforcement of any legal claims.):

Description of activity and purpose of data processing	Legal basis	Data processed	Duration
Administration, responding to complaints Responding to comments and complaints	Legal obligation	full name e-mail address telephone number Postal address other personal message	5 years
Online Registration on our website	consent of the data subject (GDPR Article 6(1)(a))	full name e-mail address telephone number	5 years

¹ The website is maintained and developed by XY as a data processor. XY processes personal data exclusively on the instructions of the Cogito Foundation, to the extent necessary for the provision of services, and does not use it for its own purposes.

If you have any questions regarding data processing, you can request further information by emailing info@onthepath.eu or writing to the postal address provided. We will respond without delay, but no later than within one month, to the contact details you have provided.

3. What are cookies and how do we handle them?

Cookies are small data files (hereinafter: cookies) that are transferred to your computer through the website when you use the website, and are saved and stored by your web browser. Most commonly used web browsers (Chrome, Firefox, etc.) accept and allow the download and use of cookies by default, but it is up to you to refuse or disable them by changing your browser settings, and you can also delete cookies already stored on your computer. The "Help" menu of each browser provides more detailed information on the use of cookies.

There are cookies that do not require your prior consent. Our website provides brief information about these when you first visit the site. These include authentication, multimedia player, load balancing, session cookies that help customise the user interface, and user-centred security cookies.

For cookies that require consent, if data processing begins when you visit the site, our institution will inform you at the start of your first visit and ask for your consent.

Our institution does not use or allow cookies that allow third parties to collect data without your consent.

Accepting cookies is not mandatory, but our Institution is not responsible if our website does not function as expected without cookies. The technical cookies necessary for the functioning of the website are managed within the European Union through the hosting service provided by forpsi.hu.

What cookies do we use?

Type	Name	Consent	Description	Purpose	Validity
<i>System cookies</i>		<i>Not required</i>	<i>session cookie for the web application firewall, which is used to prevent cross-site request forgery and</i>	<i>ensuring the functioning of the website</i>	<i>end of browser session</i>
<i>tracking cookie</i>		<i>request</i>	<i>for personalisation</i>	<i>Remembering your settings Improving the efficiency of our service</i>	<i>30 days</i>
				<i>increase</i>	
<i>tracking cookie (third party)</i>		<i>does not require</i>	<i>new sessions and visitor identification, the Google Analytics web tracking service saved</i>	<i>visiting the website, it connects to third-party services (e.g. Google)</i>	<i>15 minutes</i>

For detailed information on third-party cookies, see <https://www.google.com/policies/technologies/types/>, and about data protection here <https://www.google.com/analytics/learn/privacy.html?hl=huolvashat>

4. What else should you know about our data processing practices in relation to our website?

You voluntarily provide us with your personal data during registration or when contacting our Institution, so please take care to ensure that the data you provide is true, correct and accurate, as you are responsible for it. Incorrect, inaccurate or incomplete data may prevent you from using our services.

If you provide the personal data of another person rather than your own, we assume that you have the necessary authorisation to do so.

You may withdraw your consent to data processing at any time free of charge

- ☐ by cancelling your registration,
- ☐ by withdrawing your consent to data processing, or
- ☐ by withdrawing your consent to the processing or use of any data that is mandatory to fill in during registration or by requesting its blocking.

For technical reasons, we undertake to register the withdrawal of consent within 5 days, but please note that we may continue to process certain data after the withdrawal of consent in order to fulfil our legal obligations or to enforce our legitimate interests.

In the event of the use of misleading personal data, or if one of our visitors commits a criminal offence or attacks our institution's system, we will immediately delete their data at the same time as terminating their registration, or – if necessary – retain it for the duration of civil liability proceedings or criminal proceedings.

5. Other data processing issues

We may only transfer your data within the limits specified by law, and in the case of our data processors, we ensure through contractual terms and conditions that they may not use your personal data for purposes contrary to your consent. Further information can be found in point 2. The website uses Google Analytics, which may involve the transfer of anonymised data outside the European Union. Data transfers are carried out with the appropriate safeguards approved by the European Commission. During the operation of the website, personal data is processed within the European Union, in data centres in the Czech Republic, using the hosting services of forpsi.hu (BlazeArts Kft.). Data transfer takes place within the European Union.

The court, the public prosecutor's office and other authorities (e.g. the police, the tax office, the National Data Protection and Freedom of Information Authority) may request information, data or documents from our Institution. In such cases, we are obliged to comply with our data reporting obligations, but only to the extent necessary to achieve the purpose of the request.

Our collaborators and employees involved in data processing are entitled to access your personal data to a predetermined extent, subject to confidentiality obligations.

We protect your personal data with appropriate technical and other measures, ensure the security and availability of the data, and protect it from unauthorised access, alteration, damage, disclosure and any other unauthorised use.

As part of our organisational measures, we control physical access to our buildings, provide ongoing training to our employees and keep paper-based documents locked away with appropriate protection. As part of our technical measures, we use encryption, password protection and antivirus software. However, please note that data transmission over the internet cannot be considered completely secure. Our institution does everything in its power to make the processes as secure as possible, but we cannot take full responsibility for data transmission via our website. However, we adhere to strict regulations regarding the data received by our institution in order to ensure the security of your data and to prevent unauthorised access.

With regard to security issues, we ask for your help in carefully safeguarding your access password to our website and not sharing this password with anyone.

6. What are your rights and remedies?

You have the right to:

- receive your personal data in a portable format and transfer it to another data controller (GDPR Article 20),
- withdraw your consent to data processing at any time, which does not affect the lawfulness of data processing prior to withdrawal,

- to be informed whether automated decision-making or profiling is taking place (our institution does not use such methods).
- request the rectification, modification or supplementation of your personal data processed by us,
- object to data processing and request the deletion and blocking of your data (except for mandatory data processing),
- you may seek legal remedy before a court,
- the supervisory authority a , or initiate (<https://www.naih.hu/panasz-vagy-kozerdeku-bejelentes-a-panasztorveny-szerint>).

Supervisory Authority: National Authority for Data Protection and Freedom of Information

□ Headquarters: 1055 Budapest, Falk Miksa utca 9-11.

□ Telephone

□ +36 (30) 683-5969

+36 (30) 549-6838

+36 (1) 391 1400

□ E-mail / Postal address

ugyfelszolgalat@naih.hu

Postal address: 1363 Budapest, Pf.: 9.

- ☐ Fax: +36 (1) 391-1410
- ☐ E-mail: ugyfelszolgalat@naih.hu
Website: <https://naih.hu/>

At your request, we will provide you with information about the data we process or that is processed by us or our authorised data processor.

- ☐ ,
- ☐ its source,
- ☐ the purpose and legal basis of data processing,
- ☐ the duration of the processing, or, if this is not possible, the criteria used to determine this duration,
- ☐ the name and address of our data processors and their activities related to data processing,
- ☐ the circumstances and effects of data protection incidents and our measures to remedy and prevent them, and
- ☐ in the event of the transfer of your personal data, the legal basis and recipient of the data transfer.

We will provide you with the information as soon as possible after receiving your request, but no later than within one month. The information is free of charge, unless you have already submitted a request for information on the same data set to us in the current year. We will refund any costs you have already paid if we have processed the data unlawfully or if the request for information has led to a correction. We may only refuse to provide information in cases specified by law, indicating the legal basis for this refusal and informing you of the possibility of seeking legal remedy or contacting the Authority.

Our institution will notify you and all those to whom it has previously transferred the data for data processing purposes of the correction, blocking, marking and deletion of personal data, unless the failure to notify does not infringe your legitimate interests.

If we do not comply with your request for correction, blocking or deletion, we will, within one month of receiving your request, either in writing or, with your consent, we will inform you of the reasons for our refusal and inform you of the possibility of seeking judicial remedy and appealing to the Authority.

If you object to the processing of your personal data, we will examine your objection as soon as possible after receiving your request, but no later than within one month, and inform you of our decision in writing. If we decide that your objection is justified, we will terminate the processing of your data, including further data collection and transfer, and we will block the data. We will also notify all those to whom we have previously transferred the personal data affected by the objection, and who are obliged to take measures to enforce the right to object.

We will refuse to comply with the request if we can demonstrate that the data processing is justified by compelling legitimate grounds which override your interests, rights and freedoms, or which are related to the establishment, exercise or defence of legal claims. If you disagree with our decision or if we fail to meet the deadline, you may appeal to the court within 30 days of the date of notification of the decision or the last day of the deadline.

Data protection disputes fall within the jurisdiction of the court, and the dispute may be brought before the court of the data subject's place of residence or place of stay, at the data subject's discretion. Foreign nationals may also lodge a complaint with the supervisory authority competent for their place of residence.

Before lodging a complaint with the supervisory authority or the court, please contact our Institution in order to reach an agreement and resolve the problem as quickly as possible.

7. What are the main laws that apply to what we do?

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing of personal data by natural persons (GDPR)
- Act CXII of 2011 on the right to self-determination in relation to information and freedom of information (Info tv.)
- Act V of 2013 on the Civil Code (Ptk.)
- Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Eker tv.)
- Act C of 2003 on Electronic Communications (Ehtv)
- Act CLV of 1997 on Consumer Protection (Fogyv tv.)
- Act CLXV of 2013 on complaints and reports in the public interest. (Pktv.)
- Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activities (Grtv.)

8. Amendment to the Data Processing Notice

Our institution reserves the right to amend this Data Processing Notice, of which it shall inform the data subjects in an appropriate manner. Information relating to data processing shall be published on the website.

1 December 2025