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CONTENT

INTRODUCTION.....	3
I. INFORMATION ABOUT THE CONTROLLER.....	4
II. DATA PROCESSINGS CONCERNING THE MBA PROGRAM	4
II.1. Data processing for the purpose of the application for the MBA program.....	5
II.2. Data processing for the purpose of payment for the MBA program costs.....	6
II.3. Data processing for the purpose of conducting the MBA program.....	6
II.4. Data processing for the purpose of certifying qualification	7
II.5. Data processing for the purpose of communication regarding the MBA program	8
III. OTHER DATA PROCESSINGS.....	10
III.1. Data processing for the purpose of keeping an ALUMNI register	10
III.2. Data processing for the purpose of sending newsletters.....	11
III.3. Data processing for advertising purposes	11
IV. DATA SECURITY.....	12
IV.1. Organizational measures.....	12
IV.2. Technical measures	12
V. DATA SUBJECT'S RIGHTS.....	13
V.1. Withdrawal of consent.....	13
V.2. Access	13
V.3. Rectification.....	14
V.4. Erasure	14
V.5. Restriction of processing.....	14
V.6. Data portability.....	15
V.7. Procedure concerning the exercise of the data subject's rights	15
VI. REMEDIES.....	16
VI.1. Right to lodge a complaint with the Hungarian National Authority for Data	16
Protection and Freedom of Information	16
VI.2. Judicial remedy	16
Appendix 1	17
Appendix 2	18
Appendix 3	19

INTRODUCTION

This Privacy Notice (**Notice**) provides information on data processing concerning the participants of the Master of Business Administration (**MBA**) program organized by the School For Executive Education and Development Nonprofit Zrt. (**Controller**). The Controller guarantees that the Notice always contains the concrete principles and the actual data processings.

The Notice has been developed taking into account the provisions of the GDPR, the Privacy Act and all other relevant higher education regulations. **Appendix 1** of the Notice contains the information on these regulations and **Appendix 2** outlines the most important definitions.

The Notice entered into force on 1 July 2020 and shall be considered valid until cancellation in line with the data processing of the participants. The Notice is available in print format at the seat of the Controller and via the following URL: <http://www.seed-uni.com/privacy-policy/>

The Controller reserves the rights to unilaterally modify the Notice at any time. In case the Notice should be modified the Controller will inform the data subjects via its website.

Budapest, 1 July 2020

School For Executive Education and Development Nonprofit Zrt.

I. INFORMATION ABOUT THE CONTROLLER

The Notice contains the name and contact details of the **Controllers**. The names and contact details of the **data processors** may be found in **Appendix 3** of the Notice.

Name of the Controller: School For Executive Education and Development Nonprofit Zártkörűen Működő Részvénytársaság

Abbreviated name: School For Executive Education and Development Nonprofit Zrt.

Company registration no.: 01-10-048062

Tax no.: 24917481-2-43

Seat: Fővám tér 8., 1093 Budapest, Hungary

Postal address: Fővám tér 8., 1093 Budapest, Hungary

E-mail: info@seed-uni.com

Telephone: +36-20-962-5173

* * *

Name of the Controller: Maastricht School of Management

Seat: Endepolsdomein 150, 6229 EP Maastricht, Hollandia

Postal address: PO Box 1203, 6201 BE Maastricht, Hollandia

E-mail: info[kukac]msm.nl; privacy[kukac]msm.nl

Telephone: +31-43-387-0808

II. DATA PROCESSINGS CONCERNING THE MBA PROGRAM

The Controller considers it especially important that the corporate managers and experts can face the challenges of everyday life with proper leadership competencies and skills. In order to achieve this, the Controller has developed an MBA program in cooperation with Maastricht School of Management (MSM), and the program has been accredited by the Educational Authority. With a focus on providing a high-quality MBA program, some of the personal data of the participants need to be processed as follows.

II.1. Data processing for the purpose of the application for the MBA program

You may apply for the MBA program via the website of Maastricht School of Management. Following the registration, data subjects can provide the information necessary for the application to the Controller and MSM. Such data shall be stored by the Controller in accordance with the provisions of Section 1 of Paragraph 18 and Appendix 3 of the Act on National Higher Education. In this respect, the Controller processes your personal data as follows:

- Personal data processed: surname and given name, title, place and date of birth, place of residence (country), citizenship, data of passport (surname and given name, surname and given name at birth, place of birth, date of birth, gender, citizenship, facial image and signature, passport type, passport number, issue date, passport expiration date, code of the issuing Hungarian state, name of the issuing authority), contact details (e-mail address, mobile phone number, permanent address, emergency contact details (name, e-mail address, phone number, relationship with the data subject), data related to the chosen program (title of the program, commencement date of the program, specialisation), data related to professional knowledge (professional experience, English language skills), education data (qualification, certificate number, issuing institution, issue date), data related to academic performance (subjects completed, grades, date of exam), data in CV (current workplace, position, previous workplaces, qualification data), data in cover letter (data subject's reasons for applying), data in letters of recommendation (data subject's name, relationship between the person recommending and the data subject, the recommending person's opinion about the data subject), result achieved on the Graduate Management Admission Test or the Graduate Record Examination or at Leveling course, result achieved on the Inbound test, copy of documents (document certifying qualifications, course book, passport, CV, cover letter, recommendations, Graduate Management Admission Test certificate or Graduate Record Examination certificate), information on how the data subject was informed about the program.
- Purpose of data processing: Applying for the MBA program and organizing the MBA program.
- Legal basis of data processing: fulfilment of the Controller's legal obligations pursuant to Section 1 of Paragraph 18 and Appendix 3 of the Act on National Higher Education (Article 6. (1) (c) of the GDPR).
- Retention period: pursuant to Point 3 of Part I./B of Appendix 3 of the Act on National Higher Education, eighty years from the date of notification of termination of student status.

Personal data processed for the purpose of the application for the MBA program may be accessed primarily by the Controller, by MSM with regard to joint processing, by Luca Kalman private entrepreneur providing website services and maintenance,

and by Microsoft Corporation as cloud service provider. Subject to a procedure initiated by a court or by any authority, the Controller may provide access to the personal data for the court or the authority concerned.

In relation to personal data processed for the purpose of the application for the MBA program, you may exercise the right to access, the right to rectification, the right to erasure, the right to restriction of processing, the right to data portability and the right to object. The conditions for exercising the data subjects' rights can be found in **Chapter VI.** of the Notice.

For further information on the data processing of MSM, please visit <https://www.msm.nl/privacy-policy>.

II.2. Data processing for the purpose of payment for the MBA program costs

You pay the cost of the program directly to MSM. In this respect, the Controller does not process any of your personal data.

For further information on the data processing of MSM, please visit <https://www.msm.nl/privacy-policy>.

II.3. Data processing for the purpose of conducting the MBA program

Participating in the MBA program provides a great opportunity for improving professional and leadership skills and developing proper attitudes. However, there are some requirements for the qualification that can be obtained by completing the program. For example taking the exams and writing the final assignment/thesis. In this respect, the Controller processes your personal data as follows:

- Personal data processed: surname and given name, data subject's signature, data subject's performance (title of subject, result, date of completion), student ID, tax identification number, social security number, address for service, phone number, e-mail address, residence permit for non-Hungarian citizens – documentary evidence of residence permit for persons with the right of free movement and residence –, data on international insurance document, data on Identity Cards of Hungarian Nationality and Identity Cards for Family Members of Hungarian Nationals, type of legal relationship, date of commencement and termination, suspension, title of program carried out by the student, commencement date of program, method of commencement, form of financing and work schedule of the program, semesters started, date of termination and reason for terminating the program, data related to the survey of student's competences and its results, registry sheet number, data on the pre-degree certificate, final examination, complex examination, language examination, certificates previously obtained, document brought, data on the content and identification of the document issued, number of credits acquired during the program – including the credits recognised –, data on the certificate issued and its supplement (name of qualification, date of

issue of certificate and supplement, surname and given name of the person signing the document, serial number of the form for issuing the certificate and its supplement, student's registry sheet number, the language of the certificate and its supplement, other data on the certificate and its supplement, data related to the payments made by the student.

- Purpose of data processing: Conducting the MBA program.
- Legal basis of data processing: fulfilment of the Controller's legal obligations pursuant to Section 1 of Paragraph 18 and Appendix 3 of the Act on National Higher Education (Article 6. (1) (c) of the GDPR).
- Retention period: pursuant to Point 3 of Part I./B of Appendix 3 of the Act on National Higher Education, eighty years from the date of notification of termination of student status.

Personal data processed for the purpose of the application for the MBA program may be accessed primarily by the Controller, by MSM with regard to joint processing, by KODASOFT Bt. as operator of the ETN Mini system and by the teachers, thesis advisors and assessors or coaches involved in conducting the program. Subject to a procedure initiated by a court or by any authority, the Controller may provide access to the personal data for the court or the authority concerned.

In relation to personal data processed for the purpose of the application for the MBA program, you may exercise the right to access, the right to rectification, the right to erasure and the right to restriction of processing. The conditions for exercising the data subjects' rights can be found in **Chapter VI.** of the Notice.

II.4. Data processing for the purpose of certifying qualification

Students successfully completing the MBA program receive a certificate, in relation to which the Controller has registration obligation pursuant to Section 1 of Paragraph 18 and Appendix 3 of the Act on National Higher Education. In this respect, the Controller processes your personal data as follows:

- Personal data processed: surname and given name, document certifying the completion of program (title of the certified qualification, issue date of certificate, names of the persons signing the certificate, serial number of the form for issuing the certificate, student's registry sheet number, other data on the certificate, data on the supplements).
- Purpose of data processing: certifying the qualification obtained.
- Legal basis of data processing: fulfilment of the Controller's legal obligations pursuant to Section 1 of Paragraph 18 and Appendix 3 of the Act on National Higher Education (Article 6. (1) (c) of the GDPR).

- Retention period: pursuant to Point 3 of Part I./B of Appendix 3, eighty years from the date of notification of termination of student status.

Personal data processed for the purpose of the application for the MBA program may be accessed primarily by the Controller, by MSM with regard to joint processing, and by KODASOFT Bt. as operator of the ETN Mini system. Subject to a procedure initiated by a court or by any authority, the Controller may provide access to the personal data for the court or the authority concerned.

In relation to personal data processed for the purpose of the application for the MBA program, you may exercise the right to access, the right to rectification, the right to erasure and the right to restriction of processing. The conditions for exercising the data subjects' rights can be found in **Chapter VI.** of the Notice.

II.5. Data processing for the purpose of communication regarding the MBA program

It is essential that the Controller shall be able to contact you and communicate with you for the purpose of organizing and conducting the MBA program. Should we fail to communicate up-to-date information about the changes regarding the location, date of the program or the program itself, the high-quality of the program and the participation would be jeopardised. In this respect, we process your personal data as follows:

- Personal data processed: surname and given name, e-mail address, mobile phone number.
- Purpose of data processing: providing information regarding the MBA program.
- Legal basis of data processing: fulfilment of the Controller's legal obligations pursuant to Section 1 of Paragraph 18 and Appendix 3 of the Act on National Higher Education (Article 6. (1) (c) of the GDPR).
- Retention period: pursuant to Point 3 of Part I./B of Appendix 3 of the Act on National Higher Education, eighty years from the date of notification of termination of student status.

Personal data processed for the purpose of providing information regarding the MBA program may be accessed primarily by the Controller and by KODASOFT Bt. as operator of the ETN Mini system. Subject to a procedure initiated by a court or by any authority, the Controller may provide access to the personal data for the court or the authority concerned.

In relation to personal data processes for the purpose of providing information regarding the MBA program, you may exercise the right to access, the right to rectification, the right to erasure, and the right to restriction of processing. The

conditions for exercising the data subjects' rights can be found in **Chapter VI.** of the Notice.

II.6. Data provision to the Higher Education Information System

Since the MBA program is considered to be higher education, pursuant to the Act on Educational Registration the Controller is obliged to transfer personal data to the Higher Education Information System (Felsőoktatási Információs Rendszer – FIR) of the Educational Authority. FIR is part of the educational register, it is an electronic public register and its purpose is the sectoral operation of the classification system of registers and, within this framework, to establish a harmonised data provision and information transfer of the data verified by the student ID processed in the classification system of registers and by means of electronic administration – unless otherwise provided by law. The Controller transfers data primarily to the student register pursuant to Section (1) of Paragraph 6 and Appendix 3 of the Act on Educational Registration. In this respect, the Controller processes your personal data as follows:

- Personal data processed: student ID, tax identification number, social security number, address for service, phone number, e-mail address, residence permit for non-Hungarian citizens – documentary evidence of residence permit for persons with the right of free movement and residence –, data in international insurance document, data on Identity Cards of Hungarian Nationality and Identity Cards for Family Members of Hungarian Nationals, type of legal relationship, date of commencement and termination, suspension, title of program carried out by the student, commencement date of program, method of commencement, form of financing and work schedule of the program, semesters started, date of termination and reason for terminating the program, data related to the survey of student's competences and its results, registry sheet number, data related to the pre-degree certificate, final examination, complex examination, language examination, certificates previously obtained, document brought, data on the content and identification of the document issued, number of credits acquired during the program – including the credits recognised –, data on the certificate issued and on its supplement (name of qualification, date of certificate and supplement, surname and given name of the person signing the document, serial number of the form for issuing the certificate and its supplement, student's registry sheet number, the language of the certificate and its supplement, other data on the certificate and its supplement, data related to the payments made by the student.
- Purpose of data processing: fulfilment of the Controller's obligations related to the data provision to the educational register pursuant to Section (1) of Paragraph 6 and Appendix 3 of the Act on Educational Registration.
- Legal basis of the data processing: fulfilment of the Controller's legal obligation pursuant to Section 1 of Paragraph 6 and Appendix 3 of the Act on Educational Registration (Article 6 (1) (c) of the GDPR).

- Retention period: fulfilment of the Controller's legal obligation pursuant to Section (1) of Paragraph 6 and Appendix 3 of the Act on Educational Registration.

Personal data processed for the purpose of data provision to the higher education admission subsystem may be accessed primarily by the Controller, the Educational Authority (seat: H-1055 Budapest, Szalay utca 10-14.; postal address: H-1363 Budapest, Pf. 19.; webpage: <https://www.oktatas.hu>; e-mail: info[at]oh.gov.hu), and KODASOFT Bt. as operator of the ETN Mini system. Subject to a procedure initiated by a court or by any authority, the Controller may provide access to the personal data for the court or the authority concerned.

In relation to personal data processed for the purpose of data provision to the higher education admission subsystem, you may exercise the right to access, the right to rectification, the right to erasure, the right to restriction of processing. The conditions for exercising the data subjects' rights can be found in **Chapter VI.** of the Notice.

You may find further information about the data processing of the Educational Authority via the following URL: https://www.oktatas.hu/hivatal/kozerdeku_adatok/adatvedelmi_tajekoztato.

III. OTHER DATA PROCESSINGS

The Controller is not only engaged in transferring insights and knowledge, improving skills and competencies but also would like to create a community where former and current participants can share their experiences. In respect to this the Controller carries out further data processings with the purpose of building and preserving a students' community, with the purpose of communication, with the purpose of sending direct marketing messages and with the purpose of improving the quality of the program.

III.1. Data processing for the purpose of keeping an ALUMNI register

The Controller enables the former and current participants of the program to enter the register of ALUMNI. The data subject can be registered on a voluntary basis. In this respect, the Controller processes your personal data as follows:

- Personal data: first and surname, e-mail address, telephone, name of the employer, country of residence.
- Purpose: keeping an ALUMNI register, contacting participants or communication.
- Legal basis: the data subject consents (Article 6. (1) (a) of the GDPR).

- Retention period: in line with the obligation to erase personal data (exercise the right to withdraw consent or erasure).

Personal data processed for the purpose of keeping an ALUMNI register may be accessed by the Controller and by Microsoft Corporation cloud service provider. Subject to a procedure initiated by a court or by any authority, The Controller may provide access to the personal data for the court or authority concerned.

In relation to personal data processes for the purpose of keeping an ALUMNI register, you may exercise the right to withdraw consent, the right to access, the right to rectification, the right to erasure, the right to restriction of processing and the right to data portability. You may find further information on exercising the data subjects' rights in **Chapter V.** of the Notice.

III.2. Data processing for the purpose of sending newsletters

If you wish to receive up-to-date information concerning our services and trainings, you may subscribe to our newsletter. The Controller sends its newsletters via the Mailchimp service, or via its own e-mailing system. In this respect, the Controller processes your personal data as follows:

- Personal data: first and surname, e-mail address.
- Purpose: sending newsletters including commercial advertising via e-mail.
- Legal basis: the data subject consents (Article 6. (1) (a) of the GDPR)
- Retention period: in line with the obligation to erase personal data (exercise the right to withdraw consent or erasure).

Personal data processed for the purpose of sending newsletters may be accessed by the Controller, by Luca Kalman providing website services and maintenance, by GoDaddy Europe Limited providing webhosting services and by Rocket Science Group LLC providing Mailchimp services. Subject to a procedure initiated by a court or by any authority, The Controller may provide access to the personal data for the court or authority concerned.

In relation to personal data processes for the purpose of sending newsletters, you may exercise the right to withdraw your consent, the right to access, the right to rectification, the right to erasure, the right to restriction of processing and the right to data portability. You may find further information on exercising the data subjects' rights in **Chapter V.** of the Notice.

III.3. Data processing for advertising purposes

The Controller has a legitimate interest in organizing and conducting its programs. For this reason, the Controller publishes different issues in which the photo of any

participants of a given program may appear. In this respect, the Controller processes your personal data as follows:

- Personal data: photo of the participant concerned.
- Purpose: publishing different issues, advertising the activity of the Controller.
- Legal basis: the data subject consents (Article 6. (1) (a) of the GDPR).
- Retention period: in line with the obligation to erase personal data (exercise the right to withdraw consent or erasure).

Personal data processed for advertising purposes may be accessed by the Controller, by Microsoft Corporation as cloud service provider, by Facebook Inc., by Luca Kalman providing website services and maintenance, by GoDaddy Europe Ltd. providing webhosting services and the target audience of the issue concerned. Subject to a procedure initiated by a court or by any authority, The Controller may provide access to the personal data for the court or authority concerned.

In relation to personal data processes for the purpose of sending newsletters, you may exercise the right to withdraw your consent, the right to access, the right to rectification, the right to erasure, the right to restriction of processing and the right to data portability. You may find further information on exercising the data subjects' rights in **Chapter V.** of the Notice.

IV. DATA SECURITY

The Controller and the data processors are authorized to access your personal data to the extent that is necessary for the performance of their tasks. The Controller implements appropriate technical and organizational measures to ensure security of personal data.

IV.1. Organizational measures

The Controller enables access to its systems via personalized authorization. Access to the systems is possible to the extent that it is necessary for the performance of the tasks of the employee and only for the necessary time period. Only compatible personnel with proper professional, business and information security knowledge may receive authorization to IT systems and services.

The Controller and the data processors take prior commitments to confidentiality and carry out their tasks accordingly.

IV.2. Technical measures

With the exception of personal data retained by the data processor, the Controller stores all information on its own devices and in its own data center.

The Controller protects its own network with multi-layered firewalls. There are hardware firewalls at all external entry points to the network. All information is stored in separate locations to avoid accidental or unlawful destruction, loss, alteration of personal data processed.

The Controller protects its own network against external threats with multi-layered, active, and complex virus screens. External access to the systems and databases of the Controller is only allowed via virtual private network (VPN).

The Controller aims to guarantee that the devices and softwares used for the processing of personal data are appropriate and up-to-date.

The Controller aims to apply systems that allow – via logging – for the control and supervision of all operations carried out, for the detection of data breaches, for instance unauthorized accesses.

V. DATA SUBJECT'S RIGHTS

It is of utmost importance for the Controller that data processings comply with the principles of fairness, lawfulness and transparency. For these reasons, you may request information concerning your personal data, erasure of personal data, the restriction of processing, you may exercise the right to data portability and finally the right to object. In order to educate you about your rights and how you may exercise them, be informed as follows:

V.1. Withdrawal of consent

At any time and without further justification, you are entitled to withdraw your consent concerning personal data processed for the purpose of keeping an ALUMNI register, for the purpose of sending newsletters and for health-related matters. The withdrawal does not affect the lawfulness of prior data processings. However, the Controller may not continue its operations on the personal data concerned and is obliged to delete the information. The right to withdraw consent may be exercised via the contacts of the Controller.

V.2. Access

Via the contacts of the Controller, you are entitled to request access to your personal data processed by the Controller. In this respect, you will receive the following information:

- whether or not personal data are being processed;
- purposes of the processing;
- categories of personal data concerned;
- recipients or categories of recipient to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored;

- your rights;
- remedies;
- source of personal data.

You may also request a copy of the personal data undergoing processing from the Controller. In this case, you will receive the copy of personal data in a structured, commonly used and machine-readable format (PDF/XML), as well as on paper. Obtaining the copy is free of charge.

V.3. Rectification

Via the contacts of the Controller, you are entitled to request the rectification of inaccurate personal data, or the completion of incomplete personal data from the Controller. In the absence of information necessary for the rectification, the Controller may request the provision of these pieces of information. For the period enabling the verification of the accuracy of the information, the Controller will restrict the processing of personal data concerned and will suspend the processing with the exception of storing personal data.

V.4. Erasure

Via the contacts of the Controller, you are entitled to request the erasure of your personal data processed by the Controller if one of the following applies:

- personal data are no longer necessary;
- personal data have been unlawfully processed.

If the Controller concludes that it is under the obligation to erase, it will discontinue the processing of personal data concerned, and destroys the previously processed personal data. Furthermore, the Controller might be under statutory obligation to erase personal data, withdraw consent and exercise the right to object.

V.5. Restriction of processing

Via the contacts of the Controller, you are entitled to request the restriction of processing of your personal data if one of the following applies:

- you contest the lawfulness of processing and you require the restriction of processing instead of erasure of personal data;
- the Controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims.

The Controller automatically restricts the processing of personal data in case you contest the accuracy, or if you exercise the right to object. In these cases, the duration of restriction will be the time necessary for the control of accuracy of information, or – concerning your objection – the time necessary for the demonstration that there are valid interests to continue data processing.

During restriction, personal data shall not be processed, with the exception of storage. Data processing of personal data concerned may be continued in the following cases:

- you have given your consent to data processing;
- data processing is necessary for the establishment, exercise or defence of legal claims;
- data processing is necessary for the protection of the rights of another natural or legal person;
- data processing is necessary for reasons of important public interest.

The Controller will inform the data subject before the restriction of processing is lifted.

V.6. Data portability

Via the contacts of the Controller, you are entitled to request the provision of personal data processed by the Controller for further use. Furthermore, you may request the transmission of personal data directly from the Controller to another recipient defined by you.

This right may only be exercised in relation to personal data provided by you to the Controller (see chapter III.1-3.). Personal data, other than the previously mentioned information, may not be transmitted. The Controller will provide the copy of personal data in a structured, commonly used and machine-readable format (PDF/XML).

The Controller would like to inform you that the exercise of this right does not automatically result in the erasure of personal data. Furthermore, you may contact the Controller even after the request for data portability.

V.7. Procedure concerning the exercise of the data subject's rights

The Controller will provide you with information on any action taken concerning your request to exercise your rights without undue delay and in any event within 1 month of receipt of the request. That period may be extended by 2 further months where necessary, taking into account the complexity and number of the requests. The Controller will inform you of any such extension within 1 month of receipt of the request, together with the reasons for the delay.

If the Controller does not take action on your request, it will inform you without delay and at the latest within 1 month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Controller provides you with the relevant information in the form previously defined by you. If you make the request by electronic means, the information will be provided by electronic means where possible, unless otherwise requested by you.

The Controller provides you with the relevant information free of charge.

The Controller will communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller will inform you about those recipients if you request it.

The Controller is under the obligation to verify the identity of the data subject concerned. To this end, the Controller may request that you carry out such verification in person at the seat of the Controller.

VI. REMEDIES

If the Controller processes your personal data improperly, contrary to the relevant legal provisions, or if the Controller has not properly taken action on your request concerning your rights, you may choose between the following remedies.

VI.1. Right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information

If you contest the legality of operations of the Controller, you may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information via the following contacts:

- Seat: Szilágyi Erzsébet fasor 22/C. 1125 Budapest, Hungary
- Postal address: 1530 Budapest, Pf. 5.
- Telephone: +36-1-391-1400
- Fax: +36-1-391-1410
- E-mail: ugyfelszolgalat@naih.hu
- Website: <http://www.naih.hu>
- Online complaint: <http://www.naih.hu/online-uegyinditas.html>

VI.2. Judicial remedy

Furthermore, you have the right to an effective judicial remedy against the Controller. The legal action is subject to the provisions of the GDPR, the Privacy Act, the Civil Code, and the Code on Civil Procedure. The settlement of the legal action falls within the jurisdiction of the court. The legal action can be initiated at the court of the residence of the data subject (You may find the list of courts concerned via the following URL: <http://birosag.hu/torvenyszekek>). You are kindly asked to consult a lawyer before initiating a legal action.

Appendix 1

Relevant regulations

The Controller took into account the provisions of applicable laws and international best practices, with a special view to the following regulations:

- 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 (GDPR);
- Act CXIII of 2011 on informational self-determination and freedom of information (Privacy Act);
- Act C of 2003 on electronic communications;
- Act V of 2013 on the Civil Code;
- Act CXXX of 2016 on the Code of Civil Procedure;
- Act CCIV of 2011 on National Higher Education;
- Act LXXXIX of 2018 on Educational Registration.

Appendix 2

Definitions concerning the processing of personal data

- controller: the natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of personal data;
- data processing: any operation or set of operations which are performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- data transfer: transmission of personal data to a specific third party;
- erasure: depersonalization of personal data;
- restriction of processing: the temporal discontinuation of processing;
- data processor: natural or legal person which processes personal data on behalf of the controller;
- data subject: an identified or identifiable natural person; 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;
- third party: means a 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 authorized to process personal data;
- personal data: any information relating to an identified or identifiable natural person.

Appendix 3

Name and contact details of data processor

Name of data processor: Kodosoft Informatikai és Tanulmányi Betéti Társaság

Abbreviated name: Kodosoft Bt.

Seat: Hunyadi utca 3., 2132 Göd

Company registration no.: 09-06-010832

Tax no.: 21078523-3-13

Activity: providing and maintaining an interface in ETN Mini for the registration of students' data and data provision to FIR.

* * *

Name of data processor: Luca Kálmán

Seat: Budapesti út 8., 6728 Szeged, Hungary

Registration number: 53476135

Tax no.: 79799773-1-26

Activity: Website updating and maintenance services

* * *

Name of data processor: GoDaddy Europe Limited

Abbreviated name: GoDaddy Europe Ltd.

Seat: 252-254 Blyth Road, Hayes, UB3 1HA, UK

Telephone: +44-20-7084-1810

Web: <https://uk.godaddy.com>

Activity: webhosting services

* * *

Name of data processor: Microsoft Corporation



ARB Privacy Consulting Kft.

arb@arbconsulting.hu

www.arbconsulting.hu

Seat: One Microsoft Way, Redmond, Washington, 98052-6399, USA

Telephone: +1-800-426-9400, +1-425-882-8080

Web: <https://www.microsoft.com/hu-hu>

Activity: cloud services

* * *

Name of data processor: János Gazdag

Seat: Rákoskert sugárút 12. 1171 Budapest, Hungary

Tax registration no.: 8415880235

Activity: IT services