
privacy policy

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INTRODUCTION

This Privacy Notice (**Notice**) provides information on data processing concerning the participants of the training programs (**Programs**) 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 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 January 2021 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 right 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 January 2021

School For Executive Education and Development Nonprofit Zrt.

I. INFORMATION ABOUT THE CONTROLLER

The Notice contains the name and contact details of the **Controller**. 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

Email: info@seed-uni.com

Telephone: +36-20-962-5173

II. DATA PROCESSINGS CONCERNING THE PROGRAMS

II.1. Data processing for the purpose of the application for the programs

There are different ways how to apply for the Programs, either via the website of the Controller or via emails. No registration is needed in order to apply for the Programs and provide us with the necessary personal data. In this respect, the Controller processes your personal data as follows:

- Personal data processed: first and surname, date of the program, country, name of the employer, position, email address, telephone.
- Purpose: applying for the Programs and organizing the Programs.
- Legal basis: processing is necessary for the performance of a contract between the data subject and the Controller (Article 6. (1) (b) of the GDPR), processing is necessary in case of a contact person of a legal entity, the legitimate interest of the Controller concerning the provisions of its services (Article 6. (1) (f) of the GDPR).
- Retention period: during organizing and conducting the program and in line with the obligation to erase personal data (exercise the right to object or erasure).

Personal data processed for the purpose of the application for the Programs may be accessed by the Controller, by Luca Kálmán providing website services and maintenance 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 communication regarding the Programs, 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. You may find further information on exercising the data subjects' rights in **Chapter V.** of the Notice.

II.2. Data processing for the purpose of payment for the Program costs

You may pay the cost of the program by wire transfer. In this respect, the Controller processes personal data only in relation to the amount transferred to its bank account with the OTP Bank Nyrt. (beneficiary's name: School For Executive Education and Development Nonprofit Zrt.; bank account number: 11794008-24015589-00000000 (HUF); 11763945-04138884-00000000 (EUR)), as follows:

- Personal data: first and surname, amount of the wire transfer, time of the wire transfer, bank account number.
- Purpose: performing the contract of the participation in the Programs.
- Legal basis: processing is necessary for the performance of a contract between the data subject and the Controller (Article 6. (1) (b) of the GDPR).
- Retention period: the accounting documents shall be retained for 8 years in accordance with the Act C of 2000 on Accounting (Act C of 2000 section 169. § (2)).

In the event of a bank transfer the data subject's personal data may be accessed by the Controller and Controller's bank, the OTP Bank Nyrt. (seat: Nádor u.16. 1051 Budapest, Hungary; tax no.: 10537914-4-44; company registration no.: 01-10-041585; website: <http://www.otpbank.hu>; email: adatvedelem@otpbank.hu). Should there be a procedure initiated by a court or by any authority, where personal data need to be provided for the court or authority concerned, in that case the court or the authority concerned may access personal data.

In relation to personal data processes for the purpose of bank transfer, you may exercise 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.

You may find further information on data processing of OTP Bank Nyrt. via the following URL: <https://www.otpbank.hu/portal/hu/adatvedelem>.

II.3. Data processing for the purpose of conducting the Programs

The Controller may need to have access to further personal data in order to be able to choose the best trainers and coaches who can provide sufficient knowledge for the participants. In this respect, the Controller processes your personal data as follows:

- Personal data:
 - o Foundations of Management Program (**FoMP**) and SEED Online Management Program (**SOMP**): first and surname, gender, nationality, email address, mobile telephone number, name of the current and previous employers, position, name of the department, place of work (town), start date (year), number of subordinates, first names and surnames of subordinates, contact of subordinates (email address), photo, IP address, Skype address, Facebook page, Twitter, LinkedIn profile, website, YouTube profile
 - o Business Leadership Program (**BLP**) and SEED Online Leadership Program (**SOLP**): first and surname, gender, nationality, email address, mobile telephone number, name of the current and previous employers, position, name of the department, place of work (town), start date (year), number of subordinates, hobby, other recreational activity, photo, IP address.
 - o SEED Online Business Workshop (**SOBW**) and SEED Senior Executive Program (**SOSEP**): first and surname, gender, nationality, email address, mobile telephone number, name of the current and previous employers, position, name of the department, place of work (town), start date (year), number of subordinates, first names and surnames of subordinates, contact of subordinates (email address), photo, IP address.
- Purpose: applying for the Programs and organizing the Programs.
- Legal basis: processing is necessary for the performance of a contract between the data subject and the Controllers (Article 6. (1) (b) of the GDPR), processing is necessary in case of a contact person of a legal entity, the legitimate interest of the Controller concerning the provisions of its services (Article 6. (1) (f) of the GDPR), processing is necessary in case of data of subordinates to develop and complete the program.
- Retention period: during organizing and conducting the program and in line with the obligation to erase personal data (exercise the right to object or erasure).

Personal data processed for the purpose of the application for the Programs may be accessed by the Controller, by Microsoft Corporation cloud service provider, by Róbert Lukács, developer and maintainer of SEED digital platform and by the trainers and/or coaches 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 informing participant about Programs, you may exercise the right to access, the right to rectification, the right to erasure, and the right to restriction of processing, the right to data portability and the right to object. You may find further information on exercising the data subjects' rights in **Chapter V.** of the Notice.

II.4. Catering services (FoMP and BLP) and accomodation (BLP) provided

The Controller guarantees the high-quality of the program by providing adequate catering (FoMP and BLP) and accomodation (BLP) in addition to the performance, knowledge and experience of the trainers and coaches. The Controller shall process certain personal data in order to choose the best location for the program and in order to provide adequate catering for the health matters of the participants. In this respect, the Controller processes your personal data as follows:

- Personal data: first and surname, gender, name and the seat of the current employer (for the purpose of travel arrangements), position (for the purpose of determining the level of education), food allergies.
- Purpose: organizing catering (FoMP and BLP) and accomodation (BLP) for the Programs.
- Legal basis: the legitimate interest of the Controller concerning the provisions of its services (Article 6. (1) (f) of the GDPR), the data subject's consent to access personal data concerning food allergies (Article 6. (1) (a) and Article 9. (2) (a) of the GDPR).
- Retention period: during organizing and conducting the program and in line with the obligation to erase personal data (exercise the right to object or erasure).

Personal data processed for the purpose of catering and accomodation may be accessed by the Controller, by Microsoft Corporation cloud service provider and by the restaurants and hotels, event organizers involved in the program arrangements. 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 catering, 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. You may find further information on exercising the data subjects' rights in **Chapter V.** of the Notice.

II.5. Data processing for the purpose of communication regarding the Programs

It is essential that the Controller shall be able to contact you and communicate with you for the purpose of organizing and conducting the Programs. 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, the Controller processes your personal data as follows:

- Personal data: first and surname, email address, mobile telephone number.
- Purpose: providing information regarding the Programs.
- Legal basis: processing is necessary for the performance of a contract between the data subject and the Controllers (Article 6. (1) (b) of the GDPR), processing is necessary in case of a contact person of a legal entity, the legitimate interest of the Controller concerning the provisions of its services (Article 6. (1) (f) of the GDPR).
- Retention period: time required for performing the contract.

Personal data processed for the purpose of providing information regarding the Programs 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 providing information, 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. You may find further information on exercising the data subjects' rights in **Chapter V.** of the Notice.

II.6. Data processing for the purpose of complying with accounting obligations

According to the Act C of 2000 on Accounting section 169 § (2) the accounting documents underlying the accounting records directly or indirectly (including ledger accounts, analytical records and registers) shall be retained by the Controller for minimum eight years, shall be legible and retrievable by means of the code of reference indicated in the accounting records. In this respect, the Controller processes your personal data as follows:

- Personal data: first and surname, invoicing address, amount of participation fee, legal basis for paying the participation fee.
- Purpose: complying with the obligation to retain accounting documents underlying the accounting records directly or indirectly based on Act C of 2000 on Accounting.
- Legal basis: The Controller to comply with the relevant legal obligations (Article 6. (1) (c) of the GDPR).

- Retention period: complying with the obligation to retain accounting documents (Act C of 2000 section 169. § (2)) for 8 years.

Personal data processed for the purpose of complying with the obligation to retain accounting documents based on the Act C of 2000 on Accounting may be accessed by the Controller, by the Accountant of the Controller Adiuto Fortis Kft. and the National Tax and Customs Office (seat: Széchenyi u. 2. 1054 Budapest, Hungary; postal address: 1373 Budapest, Pf. 561.; email: nav_kozpont@nav.gov.hu; telephone: +36-1-428-5100). 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 complying with the accounting obligations, you may exercise the right to access, the right to rectification, the right to erasure and the right to restriction of processing. You may find further information on exercising the data subjects' rights in **Chapter VI.** of the Notice.

II.7. Data processings concerning adult learning

Concerning its adult learning activities, the Controller is registered under no. B/2020/007092 in the adult learning registry. The Controller shall include this registry no. in all adult learning-related documents, and it shall inform its clients and the persons participating in adult learning thereof. The Controller carries out the following data processings in connection with its adult learning activities.

II.7.1 Data processing concerning the conclusion of the adult learning contract

Under Section 21 of the Adult Learning Act and Section 21 of the Government Decree, the Controller shall enter into a contractual relationship with the person participating in the training program. In this respect, the Controller processes personal data as follows:

- Personal data processed:
 - o data concerning the person participating in the training program: natural identification data (name, birth name, place and date of birth, mother's maiden name), information concerning citizenship, e-mail address, phone number;
 - o data concerning the training program: title of the training program, number of courses, training hours, date of the training program, timeline of the training program, certification, method of progress control and evaluation, conditions to take examination, information concerning absence, information concerning the remuneration of the training program (training program fee, examination fee, re-examination fee), information concerning financial support of the training program, information concerning grants, information concerning breach of contract.
- Purpose of data processing: conclusion of adult learning contract.

- Legal basis of processing: conclusion of the adult learning contract between the Controller and the data subject (Article 6(1)(b) of the GDPR).
- Retention period: Controller shall retain personal data until the end of the 8th year after the conclusion of the contract (Section 21(5) of the Adult Learning Act).

Personal data processed for the conclusion of the adult learning contract may be accessed by the Controller and the administrative bodies responsible for supervising national or EU funds. If a court or other authority has initiated proceedings requiring the transfer of data to a court or authority, the court or authority may also have access to the data.

In connection with personal data processed for the conclusion of the adult learning contract, you may exercise the right to access, to rectification, to erasure, to the restriction of processing, and the right to data portability. Further information concerning the exercise of data subject rights may be found in **Chapter V.** of this Notice.

II.7.2 Data processing concerning the implementation of the training program

The training program is implemented by the Controller in accordance with and for the performance of the adult learning contract. In this respect, the Controller processes personal data as follows:

- Personal data processed:
 - o data concerning the person participating in the training program: natural identification data (name, birth name, place and date of birth, mother's maiden name), information concerning citizenship, e-mail address, phone number;
 - o other data concerning the training program: information concerning the education of the person participating in the training program (education, qualification, skills, and foreign languages), information concerning participation (entry into training program, completion of training program, and, in case of leaving the training program, exiting the training program), completed evaluation and qualification, financial obligations concerning the training program.
- Purpose of data processing: implementation of the training program in accordance with the adult learning contract.
- Legal basis of processing: performance of the adult learning contract concluded between the Controller and the data subject (Article 6(1)(b) of the GDPR).
- Retention period: Controller shall retain personal data until the end of the 8th year after the conclusion of the contract (Section 21(5) of the Adult Learning Act).

Personal data processed for the implementation of the training program may be accessed by the Controller, the Pest County Government Agency, the Hungarian Central Statistical Office, and the administrative bodies responsible for the supervision of national or EU funds. If a court or other authority has initiated proceedings requiring the transfer of data to a court or authority, the court or authority may also have access to the data.

In connection with personal data processed for the implementation of the training program, you may exercise the right to access, to rectification, to erasure, to the restriction of processing, and the right to data portability. Further information concerning the exercise of data subject rights may be found in **Chapter V.** of this Notice.

II.7.3 Registry of documents concerning adult learning

Under Section 16 of the Adult Learning Act, the Controller shall register and record certain documents to allow the administrative body responsible for the supervision of adult learning (Pest County Government Agency) to carry out its responsibilities. In this respect, the Controller processes personal data as follows:

- Personal data processed:
 - o data concerning the person participating in the training program: natural identification data (name, birth name, place and date of birth, mother's maiden name), information concerning citizenship, e-mail address, phone number;
 - o other data concerning the training program: information concerning the education of the person participating in the training program (education, qualification, skills, and foreign languages), information concerning participation (entry into training program, completion of training program, and, in case of leaving the training program, exiting the training program), completed evaluation and qualification, financial obligations concerning the training program;
 - o original documents certifying eligibility for participation, or their official copies, documents concerning prior competencies and knowledge;
 - o title of training program;
 - o name of trainer and title of curriculum;
 - o progress logbook;
 - o document of attendance signed by the participants, documents concerning online consultations;
 - o adult learning contract, documents concerning the training program and its implementation;
 - o contracts concerning the resources and infrastructure of the implementation of the training program;
 - o documents concerning employment of trainers.
- Purpose of data processing: facilitating Pest County Government Agency to carry out its responsibilities.

- Legal basis of processing: compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR read in conjunction with Section 16 of the Adult Learning Act and Section 26 of the Government Decree).
- Retention period: Controller shall retain the above-mentioned documents until the end of the 8th year after their adoption (Section 16 of the Adult Learning Act).

Personal data processed for facilitating the administrative body responsible for the supervision of adult learning to carry out its responsibilities may be accessed by the Controller and the Pest County Government Agency. If a court or other authority has initiated proceedings requiring the transfer of data to a court or authority, the court or authority may also have access to the data.

In connection with personal data processed for the implementation of the training program, you may exercise the right to access, to rectification, to erasure, and the right to the restriction of processing. Further information concerning the exercise of data subject rights may be found in **Chapter V.** of this Notice.

II.7.4 Data processing concerning information provided to authorities

Under Section 15 of the Adult Learning Act, the Controller shall upload certain personal data concerning the persons participating in the training program to the adult learning information system. In this respect, the Controller processes personal data as follows:

- Personal data processed: data concerning the training program (title of the training program, nature of the training program, place of the training program, number of courses, training hours, beginning and end of the training program), data concerning the person participating in the training program (natural identification data (name, birth name, place and date of birth, mother's maiden name,), e-mail address, highest education attainment).
- Purpose of data processing: providing compulsory information to authorities.
- Legal basis of processing: compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR read in conjunction with Section 15(1) of the Adult Learning Act).
- Retention period: Controller shall process personal for the time period necessary to fulfill the above-mentioned purpose.

Personal data processed for providing compulsory information to authorities may be accessed by the Controller and the Pest County Government Agency. If a court or other authority has initiated proceedings requiring the transfer of data to a court or authority, the court or authority may also have access to the data.

For participants of trainings started before 1 January 2021, transfer of personal data concerning the person participating in the training program (natural identification data, e-mail address, tax no.) to the adult learning information system may be priorly prohibited by the data subject in writing or in a declaration made in accordance with Section 6:7(3) of the Civil Code. In this respect, the Controller provides the declaration for the data subjects.

In connection with personal data processed for the implementation of the training program, you may exercise the right to access, to rectification, to erasure, and the right to the restriction of processing. Further information concerning the exercise of data subject rights may be found in **Chapter V.** of this Notice.

II.7.5 Data processing concerning certificates

Under Section 13/B of the Adult Learning Act and Section 22 of the Government Decree, the Controller shall issue a certificate concerning the completion of the training program if requested by the person participating in the training program, via the adult learning information system. In this respect, the Controller processes personal data as follows:

- Personal data processed: data concerning the training program (title of the training program, nature of the training program, place of the training program, number of courses, training hours, beginning and end of the training program), data concerning the person participating in the training program (natural identification data (name, birth name, place and date of birth, mother's maiden name,), e-mail address, highest education attainment).
- Purpose of data processing: generating the certificate if requested by the participant.
- Legal basis of processing: compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) of the GDPR read in conjunction with Section 15(1) of the Adult Learning Act).
- Retention period: Controller shall process personal for the time period necessary to fulfill the above-mentioned purpose.

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, email 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 emailing system. In this respect, the Controller processes your personal data as follows:

- Personal data: first and surname, email address.
- Purpose: sending newsletters including commercial advertising via email.
- 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 Kálmán 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 Kálmán 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, rectification of 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 or based on the contract between you and the Controller (see chapter II.1-3., II.5., 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. Objection

Via the contacts of the Controller, you may at any time object to the processing of your personal data based on the legitimate interest of the Controller (see chapter II.1., II.3., II.5.). In this case, the Controller will investigate whether there are 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. If the Controller establishes the existence of such grounds, the processing of personal data may be continued. If there are no such grounds, data processing shall be terminated.

V.8. 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: Falk Miksa utca 9-11., 1055 Budapest, Hungary

- Postal address: Pf.: 603., 1374 Budapest, Hungary
- Telephone: +36-1-391-1400
- Fax: +36-1-391-1410
- Email: 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 XLVIII of 2008 on Commercial Advertising;
- Act V of 2013 on the Civil Code;
- Act CXXX of 2016 on the Code of Civil Procedure;
- Act LXXVII of 2013 on Adult Education.

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: Adiuto Fortis Pénzügyi, Tanácsadó és Szolgáltató Korlátolt Felelősségű Társaság

Abbreviated name: Adiuto Fortis Kft.

Seat: Pálya utca 9., 1012 Budapest

Company registration no.: 01-09-896248

Tax no.: 14266014-2-41

Activity: accounting services

* * *

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

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



ARB Privacy Consulting Kft.

arb@arbconsulting.hu

www.arbconsulting.hu

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

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

Activity: cloud services

* * *

Name of data processor: Róbert Lukács

Seat: Bányai J. u. 9., 8200 Veszprém, Hungary

Registration number: 9078489

Tax no.: 64214847-1-39

Activity: development and maintenance of SEED digital platform

* * *

Name of data processor: János Gazdag

Seat: Rákoskert sugárút 12. 1171 Budapest, Hungary

Tax registration no.: 8415880235

Activity: IT services

You may find information in relation to the trainers and coaches via the following URL: <https://www.seed-uni.com/faculty-coaches>.