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# *privacy policy*

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## INTRODUCTION

This Privacy Notice (**Privacy Notice**) provides information concerning data processings carried out in relation with the <https://www.seed-uni.com> website (**Website**) operated by School for Executive Education and Development Nonprofit Zrt. (**Controller**). The Controller guarantees that the Privacy Notice always contains information on the concrete principles applied and the actual data processings.

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

The Privacy Notice entered into force on 1 October 2020 and shall be considered valid until cancellation. The Privacy Notice is available via the following URL: <http://www.seed-uni.com/privacy-policy/>

The Controller reserves the right to unilaterally modify the Privacy Notice at any time. In case the Privacy Notice has been modified, the Controller informs the data subjects on the Website.

Budapest, 1 October 2020

School for Executive Education and Development Nonprofit Zrt.

## I. INFORMATION ABOUT THE CONTROLLER

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

Name of the Controller: School for Executive Education and Development Nonprofit Private Limited Company

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

Seat: Fővám tér 8., 1093 Budapest, Hungary

Company registration no.: 01-10-048062

Tax no.: 24917481-2-43

Address: Fővám tér 8., 1093 Budapest, Hungary

E-mail: info@seed-uni.com

Telephone: +36-20-962-5173

## II. DATA PROCESSINGS

### II.1. Data processing for the purpose of communication

Protection of personal data and informational self-determination of the data subjects are high priorities for the Controller. With due regard to the principle of data minimization, the Controller developed the Website in order to limit data processings to the absolute necessary situations. One of these cases is the establishment and maintenance of communication with the Controller. In this respect, we process your personal data as follows:

- Personal data: first and surname, e-mail address, phone number, information provided by the data subject within the message.
- Purpose: establishment and maintenance of communication with the Controller.
- Legal basis: in case of a natural person contacting the Controller, consent of the data subject (Article 6(1)(a) of the GDPR), in case of a contact person of a legal entity, the legitimate interest of the Controller concerning the provision of its services (Article 6(1)(f) of the GDPR).

- Retention period: the obligation of erasure of the personal data (exercise of the right to withdraw consent, the right to object, or the right to erasure), no longer than 6 months from the date of the communication.

Personal data processed for the purpose of communication may be accessed by the Controller, Luca Kálmán providing website maintenance services, and GoDaddy Europe Ltd. providing webhosting services. Subject to a procedure initiated by a court or by an authority, the Controller may provide access to the personal data for the court or authority concerned.

In relation with personal data processed for the purpose of communication, 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, the right to data portability, and the right to object. You may find further information on the exercise of data subject's rights in **Chapter IV** of the Privacy Notice.

## **II.2. Data processing for marketing purposes**

If you would like 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, we process your personal data as follows:

- Personal data: first and surname, e-mail address.
- Purpose: sending newsletters.
- Legal basis: consent of the data subject (Article 6(1)(a) of the GDPR).
- Retention period: exercise of the right to withdraw consent or the right to erasure.

Personal data processed for marketing purposes may be accessed by the Controller, Luca Kálmán providing website maintenance services, GoDaddy Europe Ltd. providing webhosting services, and Rocket Science Group LLC providing the Mailchimp service. Subject to a procedure initiated by a court or by an authority, the Controller may provide access to the personal data for the court or authority concerned.

In relation with personal data processed for marketing purposes, 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 the exercise of data subject's rights in **Chapter IV** of the Privacy Notice.

### **II.3. Data processing in relation with job applications**

You may find information concerning data processing carried out by the Controller in relation with job applications via the following URL: <https://www.seed-uni.com/>

### **II.5. Cookie policy**

For information on cookies used by the Controller or a third party, please visit the pop-up window on the Website.

## **III. DATA SECURITY**

The Controller and the data processors are authorized to access your persona 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.

### **III.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.

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

### **III.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. Devices used for storage of personal data are kept in a separate, closed and secure server room.

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 Controllers 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.

## **IV. 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, finally you may exercise the right to data portability. You may exercise these rights as follows.

### **IV.1. Withdrawal of consent**

At any time and without further justification, you are entitled to withdraw you consent concerning data processings carried out for communication and marketing purposes. 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.

You may withdraw your consent concerning data processing for marketing purposes via the link inserted into the end of the newsletter.

### **IV.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;
- possible, 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.

### **IV.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 information. For the period enabling the verification of the accuracy of the information, the Controller will restrict the processing of personal data concerned.

### **IV.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 in relation to the purposes for which they were collected or otherwise processed;
- 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.

### **IV.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, but you oppose the 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 of the Union or of a Member State.

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

#### **IV.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, based on the performance of the contract between you and the Controller. Personal data other than the previously mentioned information may not be transmitted. 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).

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.

#### **IV.7. Objection**

Via the contacts of the Controller, the contact person of a legal entity may at any time object to the processing of his or her personal data for the purpose of communication. In this case, the Controller 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.

#### **IV.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 one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Controller will inform you of any such extension within one 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 one 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.

## V. 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.

### V.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
- E-mail: [ugyfelszolgalat\[at\]naih.hu](mailto:ugyfelszolgalat[at]naih.hu)
- Web: <http://www.naih.hu>
- Online complaint: <http://www.naih.hu/online-uegyinditas.html>

### V.2. Judicial remedy

Furthermore, you have the right to an effective judicial remedy against the Controller. The procedure is subject to the provisions of the GDPR, the Privacy Act, the Civil Code, and the Code on Civil Procedure. For further information, please contact a lawyer.

## 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 V of 2013 on the Civil Code;
- Act CXXX of on the Code of Civil Procedure;
- Act C of 2000 on Accounting.

## 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*

#### **Names and contact details of data processors**

Name of data processor: Luca Kálmán

Seat: Budapesti út 8., 6728 Szeged, Hungary

Registration number: 53476135

Tax number: 79799773-1-26

Activity: website 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: Rocket Science Group Limited Liability Company

Abbreviated name: Rocket Science Group LLC

Seat: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA

E-mail: [privacy@mailchimp.com](mailto:privacy@mailchimp.com)

Web: <https://mailchimp.com>

Activity: provision of MailChimp service