FranklinCovey

Privacy policy for clients applying for the notification-based training courses of FC-PANNON Tanácsadó Kft. on their personal data processed

The following privacy policy aims to provide you with all the information regarding the processing and storage of your personal data in relation to the Adult Training Contract between you and FC-PANNON Tanácsadó Kft.
Your data shall be processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 17 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 (General Data Protection Regulation) and Act CXII of 2011 on informational self-determination and freedom of information (Privacy Act).

1. What personal data do we manage?

We manage the following personal data:

a) your name and electronic mail address as contact details;
b) personal data based on Section 21 (1) of the Act LXXVII. of 2013. The adult training institution is required to keep record of the following data in relation to conducting the training:
participant's personal identifiable information*; e-mail address; highest completed level of education;
*personal identifiable information: name, birth name, place and date of birth and mother's maiden name;
c) letters and messages you sent to us in relation to the training course and the implementation of the contract;
d) mailing address (in case you require a certification in print form).

2. Purpose of data management

FC-PANNON Tanácsadó Kft. handles personal data in order to fulfil its liabilities based on the Adult Training Contract or the agency contract with your employer and to comply with the legal requirements in force.

3. Legal basis of data management

a) Section 21 (1) of the Act LXXVII. of 2013. and GDPR Article 6 (1) (c);
b) in case of you being an individual client, the fulfillment of the adult educational contract signed by you as participant in accordance with GDPR Article 6 (1) b);
c) in case of you participating on the basis of the adult educational contract signed by your employer, the fulfillment of the contract by applying for the training in accordance with GDPR Article 6 (1) b);
d) in case of data management operations related to accounting and public charges, fulfilment of the legal obligations of FC-PANNON Tanácsadó Kft., GDPR Article 6 (1) (c).
e) After the contract is fulfilled by both parties, the legitimate interest of FC-PANNON Tanácsadó Kft. related to the defence of claims to prove the contractual performance of its services in proceedings of a court, authority or any other body aiming to settle disputes between the parties. In this case, the legal basis for the processing or transmission of data is provided by the sectoral legislation applicable to the acting authority.

4. Who is going to have access to your data?

The data manager of the data recorded is FC-PANNON Tanácsadó Kft. (registered seat: 1124 Budapest, Németvölgyi út 64., represented by: László Bölcsföldi managing director, registering

court: Metropolitan Tribunal, company registration number: 01-09-163641, e-mail: office@franklincovey.hu, phone: 1/202-0448). The only persons having access to your personal data are the employees and managers of FC-PANNON Tanácsadó Kft. who are involved in the organization and undertaking of training programs.
For the duration of this activity the data manager shall not transfer data to other data managers. The transfer of personal data is only permitted if the data manager is legally obligated to do so, which consists of the following cases:
Data manager shall not disclose these personal data to a third party. The transmission of personal data is only allowed in case of legal requirement under the following circumstances: Act LXXVII of 2013 Section 15 (1) (a) (b) of the Act (adult educator transmits the natural identification data, electronic mail address and tax number of the participants of the training to the Adult Education Data Provision System if the participant in the training has not previously prohibited the transmission of data); Section 21 (4); legal obligation to provide information to the tax authority.

5. In case the Adult Training Contract is signed via DocuSign

FC-PANNON Tanácsadó Kft. will send the fillable and to be signed contract from its own DocuSign account to the participant's e-mail address. After both parties have signed the contract and received the signed electronic contract via e-mail, the contract is considered concluded. The contract sent by FC-PANNON Tanácsadó Kft. from the DocuSign account is provided with an electronic signature, which shall be accepted as valid by both parties.
FC-PANNON Tanácsadó Kft. created its account in Hungary. DocuSign stores every data in a data center within the EU. For more information please visit: https://www.docusign.com/content/data-residency
FC-PANNON Tanácsadó Kft. will permanently delete all data from its account within 7 days of the last day of the training. To read DocuSign's privacy policy, please visit: https://www.docusign.com/company/privacy-policy

6. Data security

FC-PANNON Tanácsadó Kft. has implemented the appropriate technical and organizational measures taking the risks of varying probability and severity to the rights and freedom of natural persons to account in order to guarantee appropriate data security at all times for the personal data processed and stored.

The security of data management is provided by the following IT security solutions:

The administrative work by FC-PANNON Tanácsadó Kft. can only be performed by dedicated employees. The IT system is protected against external attacks with firewall technology. The firewall is operated centrally.
FC-PANNON Tanácsadó Kft. and its data processors handle the personal data of the participants only if and as long as one of the data management purposes indicated above exists.

7. How long may we manage your data?

Your contact information is managed for 5 years after your participation in the training. If an online survey has been conducted, data management in relation of the survey is regulated by relevant passages of the contract. Your data based on Section 21 (1) of the Act LXXVII of 2013. will be managed according to Section 21 (5) until the last day of the 8th year from the conclusion of the Adult Training Contract.

In case you have asked for a printed certification and have provided a mailing address in your contract, your mailing address will be managed until the last day of the 8th year from the conclusion of the Adult Training Contract.
Your name and address (in case of you being an individual client) or the name and address of your employer (in case of a contract signed by your employer) will be managed until the expiration of the right to calculate taxes (including contributions and other taxes).

8. Your rights

Based on the right of access, you may request information about your personal data stored and processed by FC-PANNON Tanácsadó Kft. including the purpose, legal basis and duration of the activity. You may also request a copy of your personal data stored and processed.
You have the right to request FC-PANNON Tanácsadó Kft. correct inaccurate personal data without undue delay.

You have the right to have your personal data deleted or to restrict the data management without undue delay by FC-PANNON Tanácsadó Kft. if the legal conditions exist.

You have the right to object at any time if the management of your personal data is based on the legitimate interest of FC-PANNON Tanácsadó Kft.; if your personal data are used for the direct acquisition of business; if your personal data is used for profiling.

9. How you can access the information related to your personal data

Your requests will be fulfilled free of charge for the first time in each case; however, in case of manifestly unfounded or excessive (eg. unreasonably repeated) requests for access we reserve the right to refuse such a request or to reimburse the costs incurred.
Your rights of provision and access can only be granted in case your inquiries arrive from the e-mail address you provided as your contact details or after prior identification. If you would like to exercise your rights, please let us know at one of the following contacts:
a) via e-mail: office@franklincovey.hu
b) via phone: 1/202-0448

We receive complaints about the lawfulness of data processing at the same contacts.
If you have an objection to the management of your data, please contact FC-PANNON Tanácsadó Kft. to resolve your complaint.

Head office: 1124 Budapest, Németvölgyi út 64.
Postal address: 1124 Budapest, Németvölgyi út 64.
E-mail: office@franklincovey.hu
Phone: +36 1 202-0448

Additionally, you may file action for unlawful processing of your personal data and violation of your rights to information self-determination to the Hungarian National Authority for Data Protection and Freedom of Information.Headquarter: 1055 Budapest, Falk Miksa utca 9-11.
Postal address: 1363 Budapest, Pf.: 9.
E-mail: ugyfelszolgalat@naih.hu
Phone: + 36 1 391-1400

In the event of a breach of your rights you may file action to court against the data manager (to either the headquarter of the defendant or to your place of residence). The court is acting out of turn in the case.