

# Privacy Policy

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## Data Controller Service Provider Information

Name: FC-PANNON Tanácsadó Kft. (FranklinCovey Hungary)

Address: 1124 Budapest, Németvölgyi út 64.

Location of Data Processing: 1124 Budapest, Németvölgyi út 64.

Email Address: [office@franklincovey.hu](mailto:office@franklincovey.hu)

Phone Number: +36 1 202 0448

Representative: László Bölcsföldi, Managing Director

## Data Processing Principles

FC-PANNON Tanácsadó Kft. (Service Provider) is committed to protecting visitors' personal data and considers the respect of users' informational self-determination rights to be of paramount importance. FC-PANNON Tanácsadó Kft. treats the personal data of visitors confidentially and takes all necessary security, technical, and organizational measures to ensure data security.

Below we present our data processing principles and outline the requirements that we set and follow for ourselves as a data controller. Our data processing principles are in line with the current data protection laws, particularly including the following:

- **REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL** (April 27, 2016) on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- Act CXII of 2001 on the Right to Informational Self-Determination and Freedom of Information.
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services.

- Act C of 2003 on Electronic Communications.
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising.
- Act LXVI of 1992 on the Protection of Personal Data and the Registration of Addresses.
- Act CXIX of 1995 on the Use of Name and Address Information Serving Research and Direct Marketing Purposes.
- Act V of 2013 on the Civil Code,
- and any other legislation containing mandatory data processing provisions.

The data protection concept is based on informed, voluntary consent, which we aim to achieve at all stages of service use.

### **Legal Basis of Data Processing**

Data processing on the [www.franklincovey.hu](http://www.franklincovey.hu) website occurs with the voluntary consent of users who visit and register on the website. Registration includes filling in a form containing personal data and accepting the terms outlined in the data processing information.

1. Fulfillment of Contract
2. Fulfillment of Legal Obligation
3. Consent Basis

### **Newsletter Subscription Rules**

Visitors to [www.franklincovey.hu](http://www.franklincovey.hu) use the service voluntarily. They acknowledge that FC-PANNON Tanácsadó Kft.'s newsletter service is only available after registration. Anyone can subscribe to the newsletter, thus consenting to FC-PANNON Tanácsadó Kft. using their email address to send them newsletters, marketing, and commercial offers when consent for advertising purposes has been given.

The legal basis for data processing: the data subject's consent.

The User/Data Subject can unsubscribe from the newsletter at any time by clicking the unsubscribe button in the newsletter or by sending an email to [office@franklincovey.hu](mailto:office@franklincovey.hu). Upon receiving such a notification, the Service Provider will promptly, but no later than within one (1) business day, delete the email address from the newsletter list and ensure that the User/Data Subject no longer receives newsletters, advertisements, or direct marketing materials from FC-PANNON Tanácsadó Kft. central addresses from that point forward. The retention period of personal data: until the newsletter service is maintained or until the data subject withdraws their consent (requests deletion).

### **Data Collected and Processed During Newsletter Subscription**

- Name (first and last name)
- Email address

### **Data Processing by External Service Providers**

The HTML code of the [www.franklincovey.hu](http://www.franklincovey.hu) website, as well as the HTML code of sent newsletters, may contain links from and to external servers.

### **Recipients or Categories of Recipients of Personal Data**

Employees of FC-PANNON Tanácsadó Kft. responsible for customer service and marketing activities, and employees of FC-PANNON Tanácsadó Kft.'s IT service provider acting as data processors for hosting services.

### **Rules for Registration for Public Training**

Legal basis for data processing: the data subject's consent.

### **Data Collected and Processed During Registration for Public Training**

- Name (first and last name)
- Email address
- Phone number
- Position
- Billing address

The data subject agrees that the data provided during registration will be processed by FC-PANNON Tanácsadó Kft. for the purpose of organizing the public training. This includes:

- Informing the data subject about training details via email before the training,
- Creating documentation (attendance sheets and certificates) during the training,
- Sending follow-up emails after the training to reinforce the learned materials.

### **Retention Period of Personal Data**

The data will be retained for 5 years following the public training or until the data subject withdraws consent (requests deletion).

## **Recipients or Categories of Recipients of Personal Data**

Employees of FC-PANNON Tanácsadó Kft. responsible for customer service and marketing activities, and employees of FC-PANNON Tanácsadó Kft.'s IT service provider acting as data processors for hosting services.

## **Community Guidelines / Data Processing on FC-PANNON Tanácsadó Kft.'s Social Media Pages**

FC-PANNON Tanácsadó Kft. maintains a Facebook page for the purpose of introducing and promoting its products and services.

Questions posted on the pages of FC-PANNON Tanácsadó Kft. do not constitute an officially submitted complaint.

Personal data posted by visitors on the pages of FC-PANNON Tanácsadó Kft. are not processed by the Company.

The Privacy Policy and Terms of Service of the respective social media platform apply to visitors.

In the case of publishing unlawful or offensive content, FC-PANNON Tanácsadó Kft. may exclude the individual from the group or delete their comments without prior notice.

FC-PANNON Tanácsadó Kft. is not responsible for any content posted by users that violates the law on social media platforms. FC-PANNON Tanácsadó Kft. is also not liable for any errors, disruptions, or problems arising from changes in the operation of social media platforms.

## **RIGHTS RELATED TO DATA PROCESSING**

**Right to Request Information:** Any individual may request information through the provided contact details regarding what personal data the organization processes, on what legal basis, for what data processing purpose, from what source, and for how long. Upon request, information must be sent to the provided contact address without delay, but no later than within 30 days.

**Right to Rectification:** Any individual may request the modification of their data through the provided contact details. The request must be acted upon without delay, but no later than within 30 days, and information must be sent to the provided contact address.

**Right to Erasure:** Any individual may request the deletion of their data through the provided contact details. This request must be fulfilled without delay, but no later than within 30 days, and confirmation of the deletion must be sent to the provided contact address.

**Right to Restriction:** Any individual may request the restriction of their data through the provided contact details. The restriction remains in place as long as the specified reason necessitates the storage of the data. This request must be fulfilled without delay, but no later than within 30 days, and information must be sent to the provided contact address.

**Right to Object:** Any individual may object to data processing through the provided contact details. The objection must be reviewed as soon as possible, but no later than within 15 days from the date of submission. A decision on the validity of the objection must be made, and the outcome must be communicated to the provided contact address.

### **Amendment of the Data Processing Policy and Information:**

The Service Provider reserves the right to unilaterally modify this policy at any time.

The Service Provider is obliged to publish this policy, as well as any amendments, along with the consolidated Data Processing Policy and Information, at a prominent location on the Portal's homepage, or in a manner that is easily accessible from there, in a downloadable, viewable, and printable format, free of charge.

### **Legal Remedies Available to Data Subjects**

#### **1. Court**

In the event of a violation of their rights, the Data Subject may file a lawsuit against the data controller with the competent court, or in Budapest, the Budapest-Capital Regional Court, within 30 (thirty) days from the date of communication of the decision or, if the Service Provider fails to comply with the deadline set by the Info Act, within 30 days from the last day of that deadline. The lawsuit may also be initiated before the court in the Data Subject's place of residence or habitual residence, at their choice. The court shall act with priority in the matter. The data controller is required to prove that the data processing complies with the provisions of the law.

#### **2. Data Protection Authority Proceedings**

In the event of an infringement related to the processing of personal data, the Data Subject may lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH; President: Dr. Attila Péterfalvi, registered office: 1024 Budapest, Szilágyi Erzsébet fasor 22/C, mailing address: 1530 Budapest, Pf. 5; phone number: +36-1-391-1400, fax: +36-1-391-1410; website: [www.naih.hu](http://www.naih.hu)).

### **Basic Definitions Related to Data Processing**

**GDPR:** (General Data Protection Regulation) the Data Protection Regulation of the European Union.

**Personal Data:** Data that can be associated with the data subject, particularly the data subject's name and email address.

Further definition: any information relating to an identified or identifiable natural person (data subject), from which a conclusion can be drawn about the data subject. Personal data retains this quality during data processing as long as its association with the data subject can be restored. A person is considered identifiable, in particular, if they can be identified, directly or indirectly, based on a name, an identification number, or one or more factors specific to their physical, physiological, mental, economic, cultural, or social identity.

**Special Data:** a) Data related to racial or ethnic origin, political opinions, party affiliation, religious or philosophical beliefs, membership in representative organizations, b) Data related to health status, addictions, sexual life, as well as criminal personal data.

**Consent:** The data subject's voluntary and specific expression of will based on adequate information, through which they give their unambiguous consent to the processing of personal data concerning them, covering all or specific processing activities.

**Objection:** The data subject's declaration by which they object to the processing of their personal data and request the termination of data processing or the deletion of the processed data.

**Data Controller:** A natural or legal person, or an entity without legal personality, who or which determines the purposes of data processing, makes and executes decisions regarding data processing (including the tools used), or has these decisions executed by a data processor.

**Data Processing:** Any operation or set of operations performed on data, regardless of the procedure used, including collection, recording, organization, storage, modification, use, transfer, disclosure, alignment or combination, blocking, deletion, and destruction, as well as the prevention of further use of the data. Data processing also includes taking photographs, audio or video recordings, and recording physical characteristics suitable for personal identification (e.g., fingerprint, palm print, DNA sample, iris image).

**Data Transfer:** Making data accessible to a specific third party.

**Public Disclosure:** Making data accessible to anyone.

**Data Deletion:** Making data unrecognizable in a way that it can no longer be restored.

**Data Blocking:** Making the transmission, access, disclosure, transformation, alteration, destruction, deletion, combination, or use of data impossible, permanently or for a specific period.

**Data Destruction:** Complete physical destruction of data or the medium containing it.

**Data Processing:** Performing technical tasks related to data processing operations, regardless of the method and tool used or the location of application.

**Data Processor:** A natural or legal person, or an entity without legal personality, who or which processes personal data on behalf of the data controller.

**Third Party:** A natural or legal person, or an entity without legal personality, that is not identical to the data subject, data controller, or data processor.

**Third Country:** Any country that is not a member of the European Economic Area.

**Service Provider:** FC-PANNON Tanácsadó Kft., Registered Office: 1124 Budapest, Németvölgyi út 64, Tax Number: 10727768-2-43, Company Registration Number: 01-09-163641.

**Service:** The services provided by the Service Provider and available to Users, which the Service Provider is entitled to freely determine, modify, discontinue, introduce, or alter at its discretion. Services include, but are not limited to, the Service Provider's games, online administration, newsletter services, and functions, as well as any other services provided by the Service Provider, either temporarily or permanently.

Further information is available from the European Commission here:  
[https://ec.europa.eu/info/law/law-topic/data-protection/reform\\_hu](https://ec.europa.eu/info/law/law-topic/data-protection/reform_hu).

## **Data Processing Principles**

Personal data may be processed if: a) the data subject has consented, or b) processing is ordered by law or a local government decree based on legal authorization within the specified scope. Special data may be processed if the data subject has given written consent, or if processing is ordered by law.

The data subject may grant consent within a written contract with the data controller for the purpose of fulfilling the contract. The contract must include all information the data subject needs to know about the processing of personal data, particularly specifying the data to be processed, the duration of processing, the purpose of use, data transfer, and involvement of any data processor.

The contract must unambiguously state that the data subject consents to the processing of their data as specified in the contract by signing.

Personal data may only be processed for specific purposes, to exercise a right or to fulfill an obligation. Data processing must comply with this purpose at all stages.

Only personal data that is essential for achieving the purpose of processing, adequate for the purpose, and limited to the necessary extent and duration may be processed.

Personal data may only be processed with informed consent.

The data subject must be clearly, comprehensibly, and thoroughly informed about all facts related to the processing of their data, including the purpose and legal basis of processing, the individuals authorized to process and handle data, the duration of processing, and who may

access the data. The information must also cover the data subject's rights related to processing and available remedies.

The processed personal data must meet the following requirements: a) data collection and processing must be fair and lawful; b) data must be accurate, complete, and up-to-date when necessary; c) data storage must be suitable for allowing the identification of the data subject only as long as needed for the purpose of storage.

It is prohibited to use a general and uniform personal identifier that can be used without restriction (e.g., personal identification number).

Personal data may only be transferred or linked across different processing activities if the data subject has consented, or if the law allows it, and if the conditions for processing are met for each piece of personal data.

Personal data (including special data) may only be transferred outside the country—to a data controller or processor located in a third country—if: a) the data subject has given explicit consent, or b) it is allowed by law, and the processing or handling of the data in the third country ensures an adequate level of protection for personal data.

Transfers of data to member states of the European Economic Area are considered as if they occurred within the territory of Hungary.

The data controller, or within its scope of activities, the data processor, is responsible for ensuring the security of data (as described in more detail later<sup>1</sup>), and must take the necessary technical and organizational measures and establish procedural rules required to implement data and confidentiality protections.

Data must be protected in particular against unauthorized access, alteration, transfer, disclosure, deletion, or destruction, as well as against accidental destruction and damage. To ensure the technical security of personal data, the data controller, data processor, or the operator of telecommunications or IT equipment must take special protective measures when personal data is transmitted via networks or other IT devices.

The data subject may request information about the processing of their personal data, as well as request the rectification or deletion of their personal data, except in cases of data processing ordered by law.

Upon request, the data controller shall provide information regarding the personal data processed by them or processed by their processor, the purpose of processing, the legal basis and duration, the name, address (registered office), and activity related to processing, as well as information on who may access the personal data and for what purpose. The data controller is required to provide information in writing, in an understandable format, within the shortest possible time, but no later than 30 days from the submission of the request. This information is free if the data subject has not yet requested similar information for the same area in the current year. In other cases, a cost may be charged. Personal data must be deleted if its processing is unlawful, the data subject requests it, the purpose of data processing ceases, or the statutory retention period expires, or if ordered by a court or data protection authority.



The data subject and any recipients to whom the data has previously been transferred for processing purposes must be notified of rectification or deletion. Notification may be omitted if it does not harm the data subject's legitimate interest in relation to the purpose of processing.

The data subject may object to the processing of their personal data if processing (or transfer) is solely required to enforce the data controller's or data recipient's right or legitimate interest, unless processing is mandated by law, or if personal data is used or transferred for direct marketing, opinion polling, or scientific research, or if other law provides for the exercise of the right to object.

The data controller must review the objection within the shortest time possible, but no later than 15 days from the date of submission, and inform the applicant in writing of the result. If the objection is justified, the data controller is required to terminate the processing—including further data collection and transfer—and block the data. The data controller must also inform all recipients to whom the data subject's personal data was previously transferred, and who are required to act to ensure the data subject's right to object is enforced.

**FC-PANNON Tanácsadó Kft. Newsletter Data Processing:** Personal data will not be disclosed to third parties without the prior and explicit consent of the data subject. Statistics derived from personal data collected about users will only be shared with third parties after being anonymized so that no personal data of the data subject can be reproduced by any means.

FC-PANNON Tanácsadó Kft. does not link personal data collected on [www.franklincovey.hu](http://www.franklincovey.hu) with data from other sources.

User data is not transferred by FC-PANNON Tanácsadó Kft. to any third country (outside the European Economic Area).

### **Cookies (Cookie) Usage on FC-PANNON Tanácsadó Kft.'s Website**

Cookies are small data files placed on the user's computer by the visited website. The purpose of cookies is to make the given info-communication and internet services easier and more convenient. There are various types of cookies, typically divided into two main categories. One type is temporary cookies, which are only placed on the user's device for the duration of a session (e.g., during a secure internet banking login), while the other type is persistent cookies (e.g., language settings for a website), which remain on the computer until deleted by the user. According to the European Commission's guidelines, cookies may only be placed on the user's device with their consent unless the cookie is essential for the use of the service.

For cookies that do not require the user's consent, information must be provided at the first visit to the website. It is not necessary for the full cookie policy to be displayed on the website; a summary of the information is sufficient with a link to the full policy.

In cases where cookies require user consent, this information may be provided upon the first visit to the website if data processing related to the use of cookies begins as soon as the page is visited. If the cookie is related to a feature explicitly requested by the user, the information

may also be provided when the feature is used. In this case, it is also sufficient to include a summary of the information with a link to the full policy.

On the website, visitors are informed about the use of cookies in the data processing policy.

### **Contact, Remedies**

The owner of the newsletter for [www.franklincovey.hu](http://www.franklincovey.hu), FC-PANNON Tanácsadó Kft.:

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Registered Office: 1124 Budapest, Németvölgyi út 64.

Phone Number: +36 1 202 0448

Email Address: [office@franklincovey.hu](mailto:office@franklincovey.hu)

Representative: László Bölcsföldi

For remedies or to file a complaint, please contact the National Authority for Data Protection and Freedom of Information (NAIH)!

<http://www.naih.hu/uegyfelszolgalat,-kapcsolat.html>

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