

## **Information on the processing of personal data concerning clients applying for FC-PANNON Consulting Ltd.'s notification-based training courses**

FC-PANNON Consulting Ltd is referred to as FC-PANNON from here on.

The purpose of this Privacy Notice is to provide you with transparent information about the personal data processed and stored based on the contractual adult education relationship between you and FC-PANNON.

Personal data is 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation) and Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information (Privacy Act).

### **1. Scope of your personal data processed**

We process the following personal data:

- a) your name and e-mail address as contact details
- b) personal data specified in Section 21 (1) of Act LXXVII of 2013 on Adult Education.  
The adult education institution processes the following personal data for the purpose of conducting the training:  
your personal identifiable information\*; your e-mail address; the name of the highest educational qualification; your educational identification number  
\*Personal identifiable information: name and surname, name and surname at birth, country of birth, place of birth, date of birth and mother's name and surname at birth
- c) the Form completed by you containing the information specified in the previous point and your declaration about accepting and understanding: our privacy notice, our general information notice and all the information relating to the training concerned
- d) any correspondence or messages sent by you to FC-PANNON in connection with the training
- e) in case you requested a paper certificate of completion your postal address

### **2. Purpose of data processing**

FC-PANNON processes your personal data based on

- a) a, the agency contract signed by you or your employer
- b) b, the purchase order of your employer

to fulfil the contractual obligation and to comply with legal requirements in force.

### **3. Legal basis of data processing**

- a) Article 21 (1) of Act LXXVII of 2013 on Adult Education, Article 6 (1) (c) GDPR;
- b) in case you are our private customer, the performance of the contract concluded with you as a data subject pursuant to Article 6 (1) (b) GDPR;
- c) in the case you participate in our training based on the contract with your employer, the performance of the contract based on Article 6(1) (b) GDPR by your enrolment in the training;

- d) in the case of data processing operations relating to accounting and public charges, to comply with the legal obligations of FC-PANNON, GDPR Article 6 (1) (c);
- e) After the contract is fulfilled by both parties, the legitimate interest of FC-PANNON related to the defense 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 has access to your data?**

The data controller is FC-PANNON Consulting Ltd. (registered office: 1124 Budapest, Németvölgyi road 64., representative: László Bölcsöldi, managing director, company registration number: 01-09-163641, e-mail: office@franklincovey.hu, phone: 1/202-0448, adult education registration number: B/2020/000258). Your personal data should be accessible only to employees and managers of FC-PANNON. who are involved in the organization and delivery of the training. The controller shall not transfer personal data to other controllers. The transmission of personal data is only permitted in the case of fulfilling a legal obligation in the following cases:

- a) pursuant to Article 15 (1) (b) of Act LXXVII of 2013 on Adult Education, the adult education provider shall transmit your personal identifiable information, e-mail address, highest educational qualification to the Adult Education Data System (if you have not previously prohibited the transmission of your data)
- b) pursuant to Article 21 (4) the adult education provider has legal obligation to provide data to the tax authority.

FC-PANNON engages Educational Development Informatikai Zrt. (1111 Budapest, Budafoki út 59) as Data Processor (hereinafter referred to as “Data Processor”) for the purpose of using the fKRÉTA adult education management system.

The FC-PANNON uploads the personal data of the data subjects into the fKRÉTA system, from where they are automatically forwarded to the Adult Education Data System.

FC-PANNON has entered into a detailed and comprehensive data processing agreement with the Data Processor, under which the Data Processor undertakes to implement appropriate technical and organizational measures, taking into account the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of data processing, and the varying likelihood and severity of the risks to the rights and freedoms of natural persons, in order to guarantee a level of data security appropriate to the degree of risk. Furthermore, the Data Processor undertakes to protect the data with appropriate measures, against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction and damage, and against becoming inaccessible due to changes in the applied technology. The Data Processor ensures, during the processing of personal data, the prevention of unauthorized data entry and the prevention of the use of automated data processing systems by unauthorized persons via data transmission devices. The Data Processor ensures that its employees, as well as all those who may have access to personal data in connection with the performance of the service contract, comply with the provisions of data protection legislation, and that such data are accessible only to those who strictly need to know and use them.

## **5. Establishment of a contractual adult education relationship**

Before the training, the adult education coordinator of FC-PANNON will deliver you the link to the FORMS in which you will have to provide the data specified in point 1. b. In the e-mail and on the form, all relevant information (general information, this privacy policy and information on the specific training) will be shared with you so that you can read and accept this and acknowledge that by filling in the form a contractual relationship will be established between you and the FC-PANNON. After submitting the completed form, you will be able to print or download the form in pdf format.

FC-PANNON uses Microsoft Office FORMS. Only the adult education coordinator has access to the completed forms, which are saved and stored in his/her own password-protected Microsoft account. Within 7 days after the training, the forms submitted by the data subjects will be deleted from the adult education coordinator's Microsoft account and saved on our own server in a password-protected folder, which will be accessible only by the adult education coordinator.

## **6. Data security**

FC-PANNON 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 to always guarantee appropriate data security for the personal data processed and stored.

The security of data processing is ensured by the following IT security solutions.

The administrative work carried out by FC-PANNON may only be carried out by dedicated staff members. Its IT system is also protected against external attacks by firewall technology. The firewall is operated centrally.

FC-PANNON and its processors process your personal data only if and for as long as one of the processing purposes stated above applies.

## **7. How long do we process your personal data?**

We will keep your contact information until five years after your participation in the training. If an online assessment has been carried out, the data processing related to the assessment is regulated by relevant parts of the contract. Personal data as defined in Article 21 (1) of Act LXXVII of 2013 on Adult Education and Training and the completed and submitted Form will be processed until the last day of the 8th year after the contracted adult education relationship was established, pursuant to Article 21 (5).

If you have requested a paper certificate of completion of the training and have provided your postal address on the Form, your postal address will be processed until the last day of the 8th year after the contracted adult education relationship was established.

If you are a personal customer, we will keep your name and address or, in the case of a contract with your employer, the name and address of your employer until the right to claim tax (contributions or other public charges) has expired.

## **8. Your rights**

Based on the right of access, you may request information from FC-PANNON about your personal data stored and processed, including purpose, legal basis and duration of the activity. You may also request a copy of your personal data.

You have the right to request FC-PANNON to correct inaccurate personal data without undue delay.

You have the right to obtain, at your own request and without undue delay, the erasure of personal data and the restriction of processing, if the legal conditions for such exist.

You have the right to object at any time to the processing of your personal data where the processing of the personal data is based on a legitimate interest of the controller, where the processing of the personal data is carried out for direct marketing purposes, and you also have the right to object where the controller carries out profiling using the personal data.

## **9. How can data subjects access information about their personal data?**

Your requests will be fulfilled free of charge in the first instance, but in the event of a manifestly unfounded or excessive (for example, unreasonably repetitive) request for access, we reserve the right under the law to refuse such a request or to charge a fee for compliance that is proportionate to 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 request so, please let us know using one of the following contact details:

a) by e-mail: [office@franklincovey.hu](mailto:office@franklincovey.hu)

b) by telephone: 1/202-0448

Complaints regarding the lawfulness of data processing will be received using the same contact details. If you object to the processing of your data, please contact FC-PANNON to resolve your complaint.

Address: 1124 Budapest, Németvölgyi road 64.

Postal address: 1124 Budapest, Németvölgyi road 64.

E-mail: [office@franklincovey.hu](mailto: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:

Address: 1055 Budapest, Falk Miksa street 9-11.

Postal address: 1363 Budapest, PO Box 9.

E-mail: [ugyfelszolgalat@naih.hu](mailto: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 headquarters of the defendant or to your place of residence). The court is acting out of turn in the case.