



DATA MANAGEMENT INFORMATION

We hereby inform you about the information concerning the management of your personal data:

I. Data controller:

Name: Green Fox Academy CZ s.r.o.

Registered office: Václavské nám. 837/11, 110 00 Praha 1

Telephone number: +420 733 631 993

Email address: ahoj@greenfoxacademy.com

hereinafter “we”

Contact person:

Name: Kristóf Bárdos

Email: kristof.bardos@greenfoxacademy.com

If you have any questions concerning this Information or you wish to exercise your rights under this Information, then please contact us using any of the contact options above and we will gladly answer your questions.

II. Our Data protection commitments:

We consider the provisions of this Information binding for us. We undertake all effective legal regulations concerning data management, in this regard especially Regulation (EU) 2016/679 of the European Parliament and of the Council on data protection (“GDPR”). We reserve the right to change this Information at any time and shall notify you about possible changes in due time.

III. Information concerning data controlling:

3.1. Data management concerning communication between us and you (newsletters, events) and your participation in our events

- a) Purpose of data management: all purposes necessary for establishing a contact with you, your attendance on the events organised by us and keeping you informed about current events, namely, but not limited to:
 - i) your identification and differentiation from other data subject, establishing contact on your request, sending information about upcoming event you have attended, your attendance on the event, preparation of statistics, market research, updates of this Information;

ii) sending newsletters, sending e-mail newsletters containing for example business advertisement, inquiries, prize games, information about upcoming events (e.g. workshops, aptitude tests, promotion events), personal offers and keeping contact with you.

b) Legal basis for data management:

under letter a) par. i) the enforcement of the legitimate interests pursued by us, namely, but not limited to identification and communication with the potential applicants, your attendance on our events and to our assessment of marketing efficiency and performance indicators. You are entitled to object to the abovementioned management. However, if our legitimate grounds override your interests, rights and freedoms, we are entitled to continue managing the data.

under letter a) par. ii) your freely and voluntarily given consent, which will be expressed in a separate document or by marking the respective box in the internet form. You are entitled to revoke your consent at any time, although it does not concern the legality of data management performed before the revocation.

c) Scope of controlled data: name, surname, e-mail address, telephone number, information concerning participation at events, information concerning application to the training, video and audio recordings.

d) Recipients to whom your personal data is disclosed: our competent employees and competent employees of our mother company Green Fox Academy Kft. residing at Budapest or our sister companies in other EU countries. The list of recipients of your personal data, that are not employees of any of the Green Fox Academy companies, will be available on the request sent on the abovementioned email. We do not forward your personal data to third countries nor to international organizations.

e) Duration of storing your personal data:

under letter a) par. i) one (1) year from your latest activity (e.g. from the last email sent to us, last application on our event)

under letter a) par. ii) the consent is given until withdrawn via unsubscribing from our emails. The withdrawal does not affect legality of the previous data management. After the withdrawal we will delete your personal data if there is no other legal basis for the management.

f) The provision of your personal data is not based on legal regulations nor contractual obligations. Consequence of failure to provide your personal data is:

under letter a) par. i) we are not entitled to communicate with you, you are not entitled to attend our event and we are not entitled to use your personal data for our statistics or assessment

under letter a) par. ii) you will not get notified about our current news and events.

- g) We do not use automated decision making nor profiling in the course of managing your personal data.

3.2. Data management of those applying for training

- a) Purpose of data management: all purposes necessary for acceptance of the applicants, namely, but not limited to handling training applications, entrance examinations, evaluating the stages of the admission process, evaluating professional and personal development.
- b) Legal basis for data management: performance of the contract between you and us and enforcement of the legitimate interests pursued by us, namely, but not limited to communication with the applicants, evaluation of the entrance examinations, evaluation of the applicants and to make a decision to admit an applicant. You are entitled to object to the abovementioned management. However, if our legitimate grounds override your interests, rights and freedoms, we are entitled to continue managing the data.
- c) Scope of controlled data: name, surname, date of birth, e-mail, address, telephone number, highest educational level, English language proficiency, learning preferences, form of financing, CV, profile image, source of obtaining first information about the training, video interview, assessment tests, results of professional interview.
- d) Recipients to whom your personal data is disclosed: our competent employees and competent employees of our mother company Green Fox Academy Kft. residing at Budapest or our sister companies in other EU countries, entrepreneurs preparing image and audio records for us, entrepreneurs performing mentoring services in the application procedure. The list of recipients of your personal data, that are not employees of any of the Green Fox Academy companies, will be available on the request sent on the abovementioned email. We do not forward your personal data to third countries nor to international organizations.
- e) Duration of storing your personal data: If you are only an applicant we will store your personal data one (1) year from the end of the admission procedure. If you become our student we will store your personal data three (3) years from the end of the admission procedure.
- f) The provision of your personal data is based on contractual obligations and a prerequisite for concluding a contract. Consequence of failure to provide

your personal data is your inability to participate in the admission procedure and our training and we cannot conclude the student contract with you.

- g) We do not use automated decision making nor profiling in the course of managing your personal data.

3.3. Management of the data of students admitted for training

- a) Purpose of data management: performance of the training, negotiations about your future placement to IT companies, concluding your employment contract, accounting and tax obligations.
- b) Legal basis for data management: the performance of student contract between you and us and fulfilling our legal obligations.
- c) Scope of controlled data: name, surname, birth name, date of birth, place of birth, personal identification number, bank account number, amounts of payment, address, telephone number, e-mail, CV data (that is: data of former studies, qualifications, former employment, personal interests), entrance test results, exam results, work materials prepared by you, programming codes written during the training and the evaluation of the same, evaluation of presentations, group scheduling, task distribution, online communication, tracking absences and instances of being late, professional preferences, answers given at the exit interview, video interview, assessment results.
- d) Recipients to whom your personal data is disclosed: our competent employees and competent employees of our mother company Green Fox Academy Kft. residing at Budapest or our sister companies in other EU countries, accounting companies, entrepreneurs commissioning us for workforce placement and entrepreneurs having negotiations with us to conclude such a contract (mainly IT companies), entrepreneurs preparing video and audio records for us, entrepreneurs performing mentoring services in the training, and other persons working for us and providing us with their mentoring services. The list of recipients of your personal data, that are not employees of any of the Green Fox Academy companies, will be available on the request sent on the abovementioned email. We do not forward your personal data to third countries nor to international organizations.
- e) Duration of storing the personal data: ten (10) years from the date of the last data stored about the training or from the termination of your contract.

- f) The provision of your personal data is based on legal regulations and contractual obligations and it is a prerequisite for concluding a student contract. Consequence of failure to provide your personal data is your inability to participate in the training provided by us, also we cannot conclude the student contract with you.
- g) We do not use automated decision making nor profiling in the course of managing your personal data.

3.4. Management of the data of students who completed the training

- a) Purpose of data management:
 - i) presenting you to future employers, mediating you to new partners, concluding the employment contract between you and the new partner,
 - ii) observing your professional development.
- b) Legal basis for data management:
 - under letter a) par. i) performance of student contract between you and us
 - under letter a) par. ii) your freely and voluntarily given consent, which will be expressed in a separate document or by marking the respective box in the internet form. You are entitled to revoke your consent at any time, although it does not concern the legality of data management performed before the revocation.
- c) Scope of controlled data: name, surname, birth name, date of birth, telephone number, e-mail, group scheduling, professional preferences, former and current jobs, causes of job change, position, photos, audio and video records, CV data (data of former studies, qualifications, former employment, your interests).
- d) Recipients to whom your personal data is disclosed: our competent employees and competent employees of our mother company Green Fox Academy Kft. residing at Budapest or our sister companies in other EU countries, accounting companies, entrepreneurs commissioning us for workforce placement and entrepreneurs having negotiations with us to conclude such a contract (mainly IT companies), entrepreneurs preparing video and audio records for us, entrepreneurs performing mentoring services in the assessment, and other persons working for us and providing us with their mentoring services. The list of recipients of your personal data, that are not employees of any of the Green Fox Academy companies, will be available on the request sent on the abovementioned email. We do not forward your personal data to third countries nor to international organizations.

- e) Duration of storing the personal data:
 - under letter a) par. i) five (5) years from your last activity (e.g. the last communication with us, application for an event) or from termination of your contract and settlement of all debts,
 - under letter a) par. ii) the consent is given for the period of five (5) years. You are entitled to withdraw it by a written notification. The withdrawal does not affect the legality of data management done before its receipt. After the withdrawal we will delete your personal data if there is no other legal basis for the management.
- f) The provision of your personal data is based on contractual obligations. Consequence of failure to provide your personal data is:
 - under letter a) par. i) you lose the opportunity of being placed with a new partner,
 - under letter a) par. ii) we lose the opportunity to observe your professional development.
- g) We do not use automated decision making nor profiling in the course of managing your personal data.

3.5. Data management concerning marketing and promotion

- a) Purpose of data management: to publish photographs, portraits, video/audio materials and/or your interview (collectively referred to as „the recordings”) for promotional and advertising purposes in our publications and websites, advertising or other media activities.
- b) Legal basis for data management: your freely and voluntarily given consent, which will be expressed in the separate document. You are entitled to revoke your consent at any time, although it does not concern the legality of data management performed before the revocation.
- c) Scope of controlled data: name, surname, position, photo, video or any other record which is available to catch your image or voice.
- d) Recipients to whom your personal data is disclosed: our competent employees and competent employees of our mother company Green Fox Academy Kft. residing at Budapest or our sister companies in other EU countries, the entrepreneurs of the marketing services, Facebook and any other social network we use. The list of recipients of your personal data, that are not employees of any of the Green Fox Academy companies, will be available on the request sent on the abovementioned email. We do not forward you personal data to third countries nor to international organizations.

- e) Duration of storing the personal data: The consent is given for the time of performance of the student contract and five (5) years after its termination. You may withdraw the consent at any time by a written notification. The withdrawal does not affect the legality of data management done before its receipt. After the withdrawal we will delete your personal data if there is no other legal basis for the management.
- f) The provision of your personal data is not based on legal regulations or contractual obligations. There is no consequence if you do not give us your consent with the management of your personal data.
- g) We do not use automated decision making nor profiling in the course of managing your personal data.

3.6. Cookie data management of the www.greenfoxacademy.com website:

- a) Purpose of data management:
 - i) running of our website;
 - ii) tracking and analysing your activity on our website, customizing the content of adverts on websites, Facebook and Instagram.
- b) Legal basis for data management:
 - under letter a) par. i) the enforcement of legitimate interests pursued by us, namely running our website. You are entitled to object to the abovementioned management. However, if our legitimate grounds override your interests, rights and freedoms, we are entitled to continue managing the data.
 - under letter a) par. ii) your freely and voluntarily given consent, which will be expressed by checking the respective box on pop-up tab on our website. You are entitled to forbid the using of cookies in your browser. For more info see the websites of your browser's provider.
- c) Scope of controlled data: date, time, IP address, from which websites you come, your activity on our websites, your preferences.
- d) Recipients to whom your personal data is disclosed: our competent employees and competent employees of our mother company Green Fox Academy Kft. residing at Budapest or our sister companies in other EU countries, providers of the analysing, tracking and remarketing services. The list of recipients of your personal data, that are not employees of any of the Green Fox Academy companies, will be available on the request sent on the abovementioned email. We do not forward you personal data to third countries nor to international organizations.
- e) Duration of storing the personal data:

under letter a) par. i) only for a period when you are online and on our website.

under letter a) par. ii) until you revoke your consent, but at maximum for 180 days. You can delete the cookies from your own computer and can turn off cookies in your browser. By this you revoke your consent and we will not continue to manage your data. Management of cookies is generally available in the Tools/settings menu of browsers, under Data protection settings, under cookies.

- f) The provision of your personal data is not based on legal regulations or contractual obligations, nor is a prerequisite for concluding a contract. Consequence of failure to provide data is:
 - under letter i) you cannot use our website fully, some of its functions and services can be limited,
 - under letter ii) we cannot track or analyze your manner on our website and we cannot personalize the content of adverts.
- g) We do not use automated decision making nor profiling in the course of managing your personal data.

IV. Your rights concerning data management:

You have the following rights concerning the management of your personal data:

4.1. Right to access:

You have the right to receive information from us whether we manage your personal data, and if so, then you have the right to access your personal data and to the following information:

- a) purposes of data management;
- b) categories of personal data involved;
- c) categories of recipients of your personal data, including those in third countries and international organizations;
- d) planned duration of storing your personal data, or if it cannot be determined accurately, then the criteria of determining such a period;
- e) you can request from us the correction, deletion of your personal data or the limitation of the management of the same, and you might object to the management of such personal data;
- f) option to submit complaints addressed to a supervisory authority;
- g) if your personal data was not collected from you, then all available information concerning the source of your personal data;
- h) whether we perform automated decision making or profiling and the logic applied in such cases and clear information concerning the

significance of such data management and the expected consequences for you.

You have the right to receive information from us about the appropriate data protection guarantees if your personal data is forwarded to third countries or international organizations.

At your request we provide you with a copy of your personal data being controlled. We might charge a reasonable fee for additional copies you might request, based on administrative costs. If you submit the request electronically, information shall be provided in electronic format, unless you expressly request otherwise.

4.2. Right to correction

You have the right to have the inaccurate personal data concerning you corrected by us. The correction shall be done without unreasonable delay. Considering the purpose of data management, you are also entitled to request the supplementation of incomplete personal data.

4.3. Right to deletion

You have the right to have the personal data concerning you deleted by us without unreasonable delay at your request.

We shall delete your personal data if any of the following reasons occur:

- a) your personal data is not necessary any more for the reason it was collected or otherwise managed;
- b) you revoked your consent serving as basis for the data management and data management has no other legal basis;
- c) you objected to the management of your personal data, and the appropriate requirements for deletion are met;
- d) we manage your personal data illegally;
- e) your personal data must be deleted for the performance of a legal obligation required by Union or member state laws applicable to us;
- f) collection of your personal data was performed in connection with offering services connected to information society to a child.

If we disclosed your personal data to third parties and shall delete it, we shall take the reasonably expected measures, considering the available technology and the costs of implementation, in order to inform other data controllers managing your data that you requested to be deleted about this request in order to delete your personal data in question including their copies and duplicates.

BE ADVISED! You do not have the right to deletion if the data management is necessary for the following:

- a) for exercising the right to the freedom of expression and to getting informed;
- b) for the performance of obligations requiring the management of your personal data under Union or member state law applicable to us or to

- perform tasks performed out of public interest or under exercising public powers delegated to us;
- c) for realizing public interests concerning the area of public health;
- d) for archival out of public interest, for scientific or historical research or for statistical purposes if the right to deletion would probably make such data management impossible or would seriously jeopardize it; or
- e) for the submission, enforcement and defense of legal claims.

4.4. Right to the limitation of data management

You have the right to have data management limited by us at your request if any of the following requirements is met:

- a) you dispute the accuracy of your personal data; in this case the limitation is for the period necessary for us to check the accuracy of your personal data;
- b) the data management is illegal and you do not request the deletion of data, requesting the limitation of using the same instead;
- c) we do not need your personal data any more for data management purposes, yet you require such data for submitting, enforcing or defending legal claims; or
- d) you object to data management; in this case the limitation is for the period necessary to establish whether the rightful reasons of us enjoy priority over the rightful interests of you.

If based on the above the data management is limited, such personal data may only be managed (except for storage) with your consent, or to submit, enforce or defend legal claims or to protect the rights of other natural persons or legal entities, or out of public interest of the Union or any member state.

We will inform you beforehand about releasing the limitation of data management.

4.5. Right to objection

BE ADVISED! You have the right to object to the management of your personal data at any time due to reasons concerning your situation, but only in the case if

- the legal basis of data management is the performance of tasks performed out of public interest or under exercising public powers delegated to us, or
- the data management is necessary for enforcing the rightful interests of us or a third party, including profiling.

In this case we may not manage your personal data any longer. In exceptional cases we may continue the management of your data if it is proven that data management is justified by such rightful and compelling reasons that enjoy priority over your interests and rights, or is connected to the submission, enforcement or defense of legal claims.

BE ADVISED! Besides the above you have the right (regardless of the above section) to object to the management of your personal data for direct

marketing purposes (including profiling connected to direct marketing) at any time. If you object to the management of your personal data for direct marketing purposes, then we cannot manage them for this purpose any longer.

If your personal data is managed for scientific or historical research purposes or for statistical purposes, you have the right to object to the management of your personal data due to reasons concerning your situation. However, you do not have the right to object if the data management is necessary for the performance of tasks performed out of public interests.

In connection with using services related to information society and different from the provisions of Directive 2002/58/EC you may exercise the right to objection with automated tools based on technical requirements as well. Such an objection may be if you install a program that you use so that you cannot be tracked based on your browser, your location cannot be pinpointed, your IP address is not made public and your browser does not display advertisements, offers, etc.

4.6. Right to the mobility of data

If the management of your personal data is based on your consent or performance of the contract concluded with us and the data management is performed in an automated manner you have the right to transfer your personal data to another data controller.

In such cases you have the right to receive your personal data in a widely used machine-readable format and you have the right to forward such data to another data controller without our preventing it. You also have the right to request – if it is technically feasible – that we directly forward your personal data to the other data controller.

However, you do not have the right to enforce your right to the mobility of data if the data management is for public interests or if it is necessary for the performance of tasks performed under exercising public powers delegated to us.

4.7. How to exercise your rights

Please submit requests aimed at exercising your rights using the contact options indicated in Section I.

We shall inform you about measures taken as the result of your request without unreasonable delay but within one month from receiving the request at the latest. This deadline may be extended by an additional two months, considering the complexity of the request and the number of requests. We shall inform you about the extension of the deadline within one month from receiving the request, indicating the reasons for the delay. If you submitted the request electronically, the information shall be given electronically if possible, unless you request otherwise.

If we do not take measures as the result of your request, we shall inform you without delay, but within one month from receiving the request at the latest,

about the reasons for not taking measures and about your right to file complaints at a supervisory authority and exercise your right to remedy.

We provide the information free of charge. If your request is clearly unfounded or excessive – especially due to its repeated nature – we may charge a reasonable fee or refuse taking the requested measure, considering the administrative costs of providing the requested information or taking the requested measure. Proving the clearly unfounded or excessive nature of the request is the burden of us.

We are obliged to inform all recipients to whom your personal data was disclosed about all corrections, deletions or limitations of data management, except if it proves impossible or would require a disproportionate amount of effort.

At your request we shall inform you about such addressees.

V. Your right to legal remedy

5.1. Complaint addressed to us:

If you have any complaints concerning the management of your personal data, then please contact us using any of the contact options indicated in Section I.

5.2. Complaint addressed to the Data Protection Authority:

You have the right to file a complaint at a supervisory authority – especially in the EU member state according to your usual place of residence, your workplace or the location of the assumed infringement – if, in your opinion, the management of your personal data violates the GDPR regulation or other legal regulations. The supervisory authority to which the complaint was submitted shall inform you about the procedural developments concerning the complaint and the results of the same, including that you have the right to judicial remedy.

You can file complaints at the Czech National Authority for Data Protection as supervisory authority:

Name: Czech National Authority for Data Protection (Úřad pro ochranu osobních údajů)

Registered office: Pplk. Sochora 27, 170 00 Praha 7

Telephone: +420 234 665 800

Fax: +420 234 665 444

E-mail: posta@uoou.cz

Website: <https://www.uoou.cz>

5.3. Right to compensation:

If you suffered losses as the result of violating the GDPR you are entitled to financial compensation and/or grievance fees from us or the other data processor(s).

The data processor is only responsible for damages caused by data management if they did not comply with the obligations specified in the GDPR that specifically burden the data processors or if they disregarded our rightful instructions or acted contrary to them.

If multiple data controllers (we and other data controllers) or multiple data processors are involved in the same data management and are responsible for damages caused by data management, we and other data controllers or data processor have joint and several liabilities for the total damage.

We, the other data controllers or data processor(s) are exempted from liability if we or they can prove that we or they bear no responsibility whatsoever for the event causing the damage.

5.4. Right to judicial remedy:

You have the right to turn to a court and to request effective judicial remedy from the court, if, in your opinion, your rights under GDPR were violated as the result of the management of your personal data performed in a manner not in compliance with the legal regulations.

The procedure against us or data processor shall be initiated before a court of the member state according to the place of activity of us or data processor. Such a procedure can be initiated before a court of the member state according to your usual place of residence as well, except if we or data processor is a public authority of a member state acting under its public power.

VI. Data security

We undertake to employ adequate and efficient physical, IT, organizational and administrative measures to preserve the confidential, intact and available condition of your personal data.