

## PRIVACY POLICY

Last modified: 1<sup>st</sup> September 2020

In order to make the changes of present Privacy Policy more transparent we summarize each modification in the chart below with indicating the most important changes and the date from which the changes are effective:

Version	Validity period	Changes	Downloaded
v1	01.09.2020 -	Initial version	

Thank you for choosing the services provided by or the software developed META-INF Kft. We would like to kindly inform you that it is our first priority to properly protect your personal data and to respect your rights related thereto.

To achieve the above goals present privacy policy (hereinafter as: **“Policy”**) in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (hereinafter as: **“GDPR”**) contains all information regarding the processing of personal data provided to us by the users (hereinafter as: **“User”**) of the training services (hereinafter as: **“Services”**) provided by

Company name: **META-INF Szolgáltató Korlátolt Felelősségű Társaság**

Registered seat: **1192 Budapest, Taksony utca 6. fszt. 1., Hungary**

Company registration number: **01-09-170431**

Tax number: **13024583-2-43**

Registered by: **Company Registry Court of the Metropolitan Court of Budapest**

Represented by: **Attila Gáspár, Tibor Hegyi and Dániel Marczisovszky managing directors individually**

E-mail: [info@meta-inf.hu](mailto:info@meta-inf.hu)

Telefonszám: **+36 30 515 4464**

(hereinafter as: **“Service Provider”**)

within the framework of the so called „Atlassian Solution Partner” activity. The aim of the Policy is to give a clear picture about why, how and how long we process personal data related to our Users who use our Service.

In matters not regulated by present Policy the privacy policy of the Service Provider for its other services (<https://www.meta-inf.hu/en/privacy-policy/>) shall prevail and present Policy shall be interpreted in accordance with the privacy policy for other services.

### **I. A few data privacy related definitions to better understand the Policy**

#### **Personal data**

means any information relating to an identified or identifiable natural person (‘data subject’); 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;

#### **Processing**

means any operation or set of operations which is 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;

#### **Controller**

means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and

means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by EU or Member State law;

The controller of your personal data is the Service Provider

#### Processor

means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

#### 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;

#### Data forwarding

Means the disclosure of personal data to specific third parties;

#### Data subject

Everybody who shares his/her personal data with the Service Provider through the Website or via other channels or whose personal data is processed by the Service Provider otherwise. For example, You who reads this Policy;

#### Consent of the data subject

means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

#### Sensitive data

personal data referring to racial origin, nationality, political opinions or membership in any political party, religious or other beliefs, membership of an advocacy organization, sex life, personal data concerning health, pathological data;

#### Genetic data

means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

#### Biometric data

means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data;

#### Personal data breach

means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

*Most of the above definitions are used by the GDPR. The full text of the GDPR is available at <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=HU>. The above list is not complete so should you need more information or explanation do not hesitate to contact us.*

**We would like to inform You that during our processing we do not process or request from You any sensitive, genetic or biometric data.**

## II. In which cases do we process personal data?

In accordance with the principles laid down by Article 5 Section (1) of the GDPR the personal data of the User is processed in the following cases:

- Trainings, workshops

- Invoicing
- Customer service

### III. What data, for what purpose and for how long do we process?

In the cases detailed above the legal ground for processing shall be the following:

- In accordance with article 6 Section (1) Point a) of the GDPR the freely given, specific, informed and unambiguous consent of the User (hereinafter as: „**Consent**”);
- In accordance with article 6 Section (1) Point b) of the GDPR processing is necessary for the performance of a contract to which the User is party (hereinafter as: „**Performance of Contract**”);
- In accordance with article 6 Section (1) Point c) of the GDPR processing is necessary for compliance with a legal obligation to which the controller is subject (hereinafter as: „**Compliance**”);
- In accordance with article 6 Section (1) Point f) of the GDPR processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (hereinafter as: „**Legitimate Interest**”);

**With respect to that we are not able to limit the amount of personal data may be sent to us by the User via any communication channel, because we have no influence on the User who voluntarily provide personal data, therefore we kindly request You that please only provide the most necessary information and data that is prescribed by the Service Provider in present Policy when contacting us in any was so do not share any personal data that we do not request or wish to handle under this Policy. If, despite our explicit request under this section, You provide us with information that is not necessary for the purposes of processing personal data and that may subsequently be detrimental to our Company, then by accepting present Policy You undertake to exempt our Company from any harmful consequences, including fines.**

#### IV.1. Training, workshop

The Service Provider provides the User with training related to the use of Atlassian systems, during which it is necessary to process the personal data of the persons participating in the trainings either in order to verify their participation in the training or to provide them with the training material. With respect to that the Service Provider falls under the scope of Act LXXVII of 2013 on adult education (“**AE Act**”) and Government Decree no. 11/2020 (II.7.) on the implementation of the adult education act (hereinafter as: “**AE Implementation**”) therefore the processing of the User’s personal data and the scope of data processed and the duration of processing is prescribed by law.

Scope of data processed	Purpose of processing	Ground for processing	Duration of processing
First and last name of the User	Identification of the User, data necessary for conclusion of a contract, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point aa) of the AE Act) / Performance of Contract	In connection with performance of contract until objection of processing but for the purpose of enforcing a possible claim until the end of the 5 <sup>th</sup> year following the termination of the contract (the limitation period for enforcing claims, Article 6:22 Section (1) of the Civil Code)  In connection with compliance until the last day of the 8 <sup>th</sup> year from the date of

			concluding the contract (Article 21 Section (5) of the AE Act)
Birth name of the User	Identification of the User, data necessary for conclusion of a contract, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point aa) of the AE Act) / Performance of Contract	<p>In connection with performance of contract until objection of processing but for the purpose of enforcing a possible claim until the end of the 5<sup>th</sup> year following the termination of the contract (the limitation period for enforcing claims, Article 6:22 Section (1) of the Civil Code)</p> <p>In connection with compliance until the last day of the 8<sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)</p>
The User's place of birth	Identification of the User, data necessary for conclusion of a contract, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point aa) of the AE Act) / Performance of Contract	<p>In connection with performance of contract until objection of processing but for the purpose of enforcing a possible claim until the end of the 5<sup>th</sup> year following the termination of the contract (the limitation period for enforcing claims, Article 6:22 Section (1) of the Civil Code)</p> <p>In connection with compliance until the last day of the 8<sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)</p>
The User's date of birth	Identification of the User, data necessary for conclusion of a contract, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point aa) of the AE Act) / Performance of Contract	In connection with performance of contract until objection of processing but for the purpose of enforcing a possible claim until the end of the 5 <sup>th</sup> year following the termination of the contract (the limitation period for enforcing claims, Article 6:22 Section (1) of the Civil

			Code)  In connection with compliance until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Maiden name of the User's mother	Identification of the User, data necessary for conclusion of a contract, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point aa) of the AE Act) / Performance of Contract	In connection with performance of contract until objection of processing but for the purpose of enforcing a possible claim until the end of the 5 <sup>th</sup> year following the termination of the contract (the limitation period for enforcing claims, Article 6:22 Section (1) of the Civil Code)  In connection with compliance until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Sex of the User	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point ab) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Citizenship of the User and if the User is not a Hungarian citizen then the title of residence in Hungary and the name and serial number of the document certifying the title	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point ac) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Home address / mailing address of the User	Identification of the User, data necessary for conclusion of a contract, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control	Compliance (Article 21 Section (1) Point ad) of the AE Act) / Performance of contract	In connection with performance of contract until objection of processing but for the purpose of enforcing a possible claim until the end of the 5 <sup>th</sup> year following the termination of the

	of the use and utilization of state and European Union funds		contract (the limitation period for enforcing claims, Article 6:22 Section (1) of the Civil Code)  In connection with compliance until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
E-mail address of the User	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point ad) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Phone number of the User	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point ad) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Social security number of the User	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point ae) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Tax number of the User	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point af) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Data related to entering, completing or, if not completed, quitting training	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control	Compliance (Article 21 Section (1) Point bb) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)

	of the use and utilization of state and European Union funds		
Data related to evaluation and qualification during the training	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point bc) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Data regarding payment obligation related to the training, data related to the use of a loan related to training	Identification of the User, fulfillment of statistical data forwarding obligation, fulfillment of data forwarding obligation related to the control of the use and utilization of state and European Union funds	Compliance (Article 21 Section (1) Point bd) of the AE Act)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)
Education ID of the User	Identification of the User, fulfillment of data forwarding obligation	Compliance (Article 25/A Section (1) of the AE Implementation)	Until the last day of the 8 <sup>th</sup> year from the date of concluding the contract (Article 21 Section (5) of the AE Act)

### III.2. Invoicing

III.2.1. If the invoice about the Service is issued for a legal entity then the Service Provider process the personal data found below.

Scope of processed data	Purpose of processing	Ground for processing	Naming of Legitimate interest	Duration of processing
E-mail address of the contact person designated by the User	Keeping contact with the User in connection with invoicing	Legitimate Interest of the Service Provider (Article 6 Section (1) Point f) of the GDPR)	Sending the invoice to the User to be issued mandatorily by the Service Provider in accordance with the law	Until the last day of the 5 <sup>th</sup> year following the year in which the contract was terminated or until the deletion of the User
First and last name of the contact person designated by the User	Keeping contact with the User in connection with invoicing	Legitimate Interest of the Service Provider (Article 6 Section (1) Point f) of the GDPR)	Identifying the User in connection with the invoice to be issued mandatorily by the Service Provider in accordance with the law	Until the last day of the 5 <sup>th</sup> year following the year in which the contract was terminated or until the deletion of the User
Phone number of the contact person designated by the User	Keeping contact with the User in connection with invoicing	Legitimate Interest of the Service Provider (Article 6 Section	Keeping contact the User in connection with the invoice to be	Until the last day of the 5 <sup>th</sup> year following the year in which the

		(1) Point f) of the GDPR)	issued mandatorily by the Service Provider in accordance with the law	contract was terminated or until the deletion of the User
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The Service Provider processes the above personal data only if the contact person's e-mail address contains the name of a natural person. If the contact e-mail address is general (e.g. [info@example.com](mailto:info@example.com) or [finance@example.com](mailto:finance@example.com)) then the Service Provider process the data but it shall not be considered as personal data. The Service Provider draws the User attention that if the e-mail address contains the name of a natural person the consent of the contact person to provide such data shall be obtained by the User.

III.2.2. If the invoice about the counter value of using the Service shall be issued for a natural person the Service Provider process the following data.

Scope of processed data	Purpose of processing	Ground for processing	Duration of processing
First and last name of the User	Data mandatorily to be recorded in the issued invoice	Compliance (Article 6 Section (1) Point c) of the GDPR)	8 years from issuing the invoice in accordance with Section 169 Subsection (2) of Act C of 2000 on Accounting
Address of the User	Data mandatorily to be recorded in the issued invoice	Compliance (Article 6 Section (1) Point c) of the GDPR)	8 years from issuing the invoice in accordance with Section 169 Subsection (2) of Act C of 2000 on Accounting
Tax number of the User	Data mandatorily to be recorded in the issued invoice	Compliance (Article 6 Section (1) Point c) of the GDPR)	8 years from issuing the invoice in accordance with Section 169 Subsection (2) of Act C of 2000 on Accounting
E-mail address of the User	Keeping contact with the User in connection with invoicing	Compliance (Article 6 Section (1) Point c) of the GDPR)	8 years from issuing the invoice in accordance with Section 169 Subsection (2) of Act C of 2000 on Accounting

The mandatory content of the invoice and the duration of storing is prescribed by law therefore the Service Provider process these in order to comply with its legal obligation.

### III.3. Customer service

In order to provide technical support for the Users we maintain a customer service.

*In case of requests sent by e-mail:*

If the User contacts our Customer Service by e-mail at the address [info@meta-inf.hu](mailto:info@meta-inf.hu) then by sending the e-mail the User acknowledges the processing of his/her personal data. In order to be able to fulfill Your customer service requests, certain personal data must be processed. Without these, we will not be able to complete Your customer service request as we would not be able to contact You.

Scope of processed data	Purpose of processing	Ground for processing	Duration of processing
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E-mail address of the User	Identifying the User, fulfillment of customer service requests	Fulfillment of contractual obligation (Article 6 Section (1) Point b) of the GDPR)	Until 31 <sup>st</sup> December of the year following the year in which the customer support request was resolved.
First and last name of the User (only if it is provided in the User's Atlassian account)	Identifying the User, fulfillment of customer service requests	Fulfillment of contractual obligation (Article 6 Section (1) Point b) of the GDPR)	Until 31 <sup>st</sup> December of the year following the year in which the customer support request was resolved.
The social media contact of the User possibly shared by the User in his/her e-mail „signature”	-	Fulfillment of contractual obligation (Article 6 Section (1) Point b) of the GDPR)	Until 31 <sup>st</sup> December of the year following the year in which the customer support request was resolved.

#### IV. Where and how my personal data is stored?

All personal data is stored electronically on trusted secure servers. The data we store is either on a server located within the European Union or on a server of a processor who is properly certified in relation to the processing of personal data.

The Service Provider ensures the protection of data on several levels (physically, technically and organizationally), which in each case comply with industry standards.

Notwithstanding the above, the Service Provider shall not be liable for any damage, destruction or unauthorized access to the data in the event of technical error, natural disaster, terrorist or criminal act.

#### VI. What rights do You have in connection with processing Your personal data?

**Request for information (right to access):** You may request information about the processing of Your personal data at any time, either in person, at our registered seat address, in writing by sending a registered letter or by email to [privacy@meta-inf.hu](mailto:privacy@meta-inf.hu).

Pursuant to Article 15 Section (1) of the GDPR, a request may include information on the data processed, their source, purpose, legal ground, duration, name and address of any processor, processing activities and Your rights in relation to processing. In the case of data transfer, to whom and for what purpose Your data have been or will be transferred.

A request for information is considered authentic by us if You are clearly identified by it. If the request is sent by e-mail or post, only the e-mail sent from Your registered e-mail address will be considered as authentic, and we will only be able to send information to the postal address registered by us. Unless You voluntarily verify Your identity otherwise, we will not be able to send information to an e-mail address or postal address that is not registered in our records in order to protect Your privacy.

**Rectification:** You may at any time request the rectification, modification or amendment of Your data in the same manner described above. We can also do this only on the basis of a request from a credible source presented when submitting the request.

**Restriction:** You may request that we restrict the processing of our personal information in particular if:

- You argue the accuracy of the personal data we process. In this case, the limitation refers to the period during which the accuracy of the data is checked.
- Although the legal ground for processing does not stand for us, but You are requesting us in writing to keep them for the purpose of filing, asserting or defending any legal claim You may have

**Objection:** If we process Your personal data on the ground of legitimate interest, You may at any time object to the processing of Your personal data. In such cases, we will review the legality of the

objection and, if it is well established, we terminate the processing of data and notify anyone to whom the personal data subject to the objection may have been previously transmitted.

**Deletion (“Right to be forgotten”):** You may request the deletion of Your personal data at any time for any of the reasons set out in Article 17 Section (1) of the GDPR.

We may refuse deletion if the processing of Your personal data is required by law or if it is necessary to enforce our legal claims. We will always inform You about the refusal of the request for deletion. Once it is deleted, the data cannot be recovered.

**Transfer of Personal Data (Portability):** You may at any time request us to transfer the data processed in connection with You in a structured, widely used, machine-readable format to You or to another controller.

We kindly ask You to not exercise the above rights improperly, but only if it has a real ground or if any of the conditions set out in the GDPR actually exist.

## **VI. To whom we transfer personal data and who has right to access them?**

Your personal data is kept confidential and will not be disclosed to any third party except as provided below.

### **VI.1. Rackforest**

The Service Provider use the server providing services of Rackforest which servers are located in Budapest, Hungary, i.e. within the European Union. Rackforest may be reached at:

Name: Rackforest Informatikai Kereskedelmi Szolgáltató és Tanácsadó Kft.  
Registered seat: 1132 Budapest, Victor Hugo utca 18-22. 3. em. 3008., Hungary  
Company registration number: 01-09-914549  
E-mail: [info@rackforest.com](mailto:info@rackforest.com)  
Phone number +36-70-362-4785  
Represented by: Atiyeh Nabil managing director  
(hereinafter as: “**Rackforest**”)

Rackforest’s privacy policy shall be reached through this link: <https://rackforest.com/wp-content/uploads/2019/07/adatkezelesi-szabalyzat.pdf>

### **VI.2. Correspondence (e-mail)**

The Service Provider use Gmail a product of Google Inc. to manage correspondence by e-mail.

Name: Google Ireland Ltd  
Registered seat: Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland  
Location of Servers: Dublin, Ireland  
(hereinafter as: “**Google**”)

Google processes EU related data within the territory of the European Union through its servers located in Dublin, Ireland.

Google may not access, modify, delete, use or otherwise manipulate the User related data stored on the server provided by Google.

Google provides the protection of data on multiple levels, such as physically protecting data storage servers, which are secured and supervised by security guards and technicians, it restricts access to server rooms by its employees and by providing uninterruptible power supply and other state-of-the-art infrastructure, restricting access to data, continuously monitoring its system, encryption and firewall protection. The Google Privacy Policy is available at <https://policies.google.com/privacy/frameworks>.

### **VI.3. Office365**

In connection with its „Solution Partner” related activities the Service Provider also use Office 365 by Microsoft Corporation to share documents and educational materials etc. with the User. In connection with Office 365 the processor is:

Name: Microsoft Ireland Operations Limited

Registered seat: One Microsoft Place, South County Business Park, Leopardstown, Dublin 18., Ireland

Online contacting form: <https://privacy.microsoft.com/en-us/privacy-questions>

Phone number: +353-1-706-3117

Represented by: Satya Nadella director

(hereinafter as: “**Microsoft**”)

Microsoft process the data of people living within the territory of the European Union within the EU in Ireland. It may occur that Microsoft transmits data to its parent company Microsoft Corporation however Microsoft Corporation is a Privacy Shield certified company (<https://www.privacyshield.gov/participant?id=a2zt0000000KzNaAAK&status=Active>)

Privacy related materials of Microsoft may be reached at:

<https://privacy.microsoft.com/hu-hu>

<https://privacy.microsoft.com/en-us/privacystatement>

<https://support.office.com/hu-hu/article/az-adatvédelmi-beáll%C3%ADtások-megtekintése-a-microsoft-office-adatvédelmi-központjában-d672876e-20d3-4ad3-a178-343d044e05c8?omkt=hu-HU&ui=hu-HU&rs=hu-HU&ad=HU>

VI.4. In connection with trainings:

VI.4.1. To organize trainings the Service Provider use the services of the following as processors:

Related to trainings regarding Atlassian products, our partner is:

Name: Oregional Szolgáltató és Kereskedelmi Kft.

Registered seat: 1158 Budapest, József Attila utca 49. A. ép., Hungary

Company registration number: 01-09-737092

E-mail address: [info@oregional.hu](mailto:info@oregional.hu)

Represented by: Géza Nagy managing director

(hereinafter as: “**Oregional**”)

VI.4.2. In order to fulfill its obligation under Article 15 Section (1) Point ab) the Service Provider forwards the User’s personal data to the state administration body for adult education operating the adult education reporting system (hereinafter as: “**AERS**”), which may be contacted at:

Name: Pest Megyei Kormányhivatal (Government Office of Pest County)

Registered seat: 1052 Budapest, Városház utca 7.

Identification number: 789356

Represented by: dr. Richárd Tarnai government commissioner

E-mail: [pest@pest.gov.hu](mailto:pest@pest.gov.hu)

DPO: dr. Éva Pércsi (address: 1052 Budapest, Városház utca 7., phone: +36 22 379493, e-mail:

[adatvedelem@pest.gov.hu](mailto:adatvedelem@pest.gov.hu))

(hereinafter as: „**GOPC**”)

The privacy policy of GOPC is available at:  
<https://tudasbazis.ekreta.hu/pages/viewpage.action?pageId=46760379>

**In accordance with the provisions of Article 17 Point c) of the AE Act the Service Provider informs the User, that he / she is entitled to make an objection in advance regarding the forwarding of his / her data to the state authority. If the User does not exercise this right or expressly waives this right then the Service Provider forwards the following data of the User:**

**first- and last name, birth name, place and date of birth, mother's name, tax number and e-mail address**

VI.4.3. Data forwarding related to acquiring or issuing Education ID number

Name: Oktatási Hivatal (Education Authority)  
Registered seat: 1055 Budapest, Szalay utca 10-14.  
ID of the founding document: 48049-4/2019/PKF  
Represented by: Sándor Brassói chairman  
E-mail: [info@oh.gov.hu](mailto:info@oh.gov.hu)

**The Service Provider informs the User that in accordance with Article 25/A Section (1) of the AE Implementation the Service Provider as institution for adult education shall keep records of the User as participant in adult education based on his / her education ID number. If the User does not have and education ID number or it is not known to him / her and therefore the Service Provider could not provide it for the state administration body for adult education in the AERS, then AERS takes care of retrieving or obtaining the User's educational ID in a way that the Service Provider provides the personal identification data for the state administration body for adult education in AERS and then which forwards it to the Education Authority in order to obtain the education ID number. The Service Provider informs the User that in order to fulfill its legal obligation, the transfer of the User's personal identification data to the Education Authority will take place even if the transfer of the data has been prohibited by the User in accordance with Article 15 Point a) Subsection ab). If the User has prohibited the transfer of data to the state administration body for adult education, then after retrieving the education identification number from the Education Office or after generating it, the User's personal identification data will be deleted from the AERS.**

IX.9. In connection with invoicing

The Service Provider issues its invoices with one of Hungary's largest online billing system, szamlazz.hu. If the User provides his/her own data as billing data, then as described above, since it is considered as personal data it is subject to processing by the Service Provider. Operator of szamlazz.hu website as our processing partner is:

Name: KBOSS.hu Kereskedelmi és Szolgáltató Kft.  
Registered seat: 1031 Budapest, Záhony utca 7., Hungary  
Company registration number: 01-09-303201  
E-mail address: [info@szamlazz.hu](mailto:info@szamlazz.hu)  
Represented by: Balázs Ángyán managing director  
(hereinafter as: „KBOSS”)

KBOSS has a privacy policy complying with the GDPR which is available at: <https://www.szamlazz.hu/adatvedelem/>

**VII. To whom and in what cases are we required to disclose personal data?**

We may be requested to disclose personal data we process to authorities upon request. Our company cannot be held liable for any such transfer or any resulting consequences. We will always inform You about the transfer.

**VIII. What are the responsibilities with regard to the personal data You provide?**

When You provide us Your personal data, You are responsible for ensuring that the information and contributions You make are true and correct.

We ask You to provide us third-party data only if specifically authorized to do so by the third party. Our company assumes no liability for any resulting claims.

If a third-party objects the processing of personal data by credibly verifying its identity, we will immediately delete third-party data without notifying You. Please only provide third-party personal data only if you have informed the third party of the availability of this Policy.

#### **IX. Management of Personal data breach**

Any personal data breach that may occur will be reported to the supervisory authority within 72 hours from becoming known to us in accordance with the law, and we will also maintain records of any breach that may occur. In the cases specified by law, we also inform the Users concerned.

#### **X. Data Protection Officer (DPO)**

Pursuant to Article 37 of the GDPR appointment of a DPO is mandatory if:

- a) the processing is carried out by a public authority or body, except for courts acting in their judicial capacity;
- b) the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale; or
- c) the core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to Article 9 and personal data relating to criminal convictions and offences referred to in Article 10.

With respect to that the Service Provider is not subject to any of the clauses above and because there is no other compelling reason to appoint a DPO we are not appointing anyone for this position.

#### **XI. Amendment of the Privacy Policy**

If the scope of the processed data, the legal ground of the processing or other circumstances change, this Policy will be amended and published in accordance with the provisions of the GDPR and the User will be notified of such change given that the changes will become effective from the 5<sup>th</sup> business day following the date of publication. Please be sure to read the Policy changes carefully as they contain important information about the processing of Your personal data.

#### **XII. To whom You can turn to for information regarding Your personal data or to exercise Your rights?**

If You have any questions, please contact us by email [privacy@meta-inf.hu](mailto:privacy@meta-inf.hu), phone +36 30 515 4464 or at HUNGARY, 1061 Budapest, Kiraly utca 14

The User is entitled to exercise his / her rights related to the processing of personal data against the Service Provider as controller. If You wish to exercise Your rights, You must first notify the Service Provider

If You feel that Your rights have been violated, You can complain to the National Authority for Privacy and Freedom of Information:

Name: National Authority for Privacy and Freedom of Information  
Address: 1125 Budapest, Szilágyi Erzsébet fasor 22 / C., Hungary  
Mailing address: 1530 Budapest, PO box: 5., Hungary  
Phone: 0613911400  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
Website: <http://www.naih.hu>