DATA PROCESSING INFORMATION

The Data Controller hereby informs you about the information concerning the processing of your personal data:

I. Data concerning the data controller:

Name: Green Fox Academy Korlátolt Felelősségű Társaság

Seat: 1062 Budapest, Andrássy út 66.

Phone: +36 70 362 6323

Email: hello@greenfoxacademy.com hereinafter: "Data Controller"

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. Data protection commitments of the Data Controller:

The Data Controller accepts the provisions of this Information as binding. The Data Controller agrees to comply with all the effective legal regulations concerning data processing, in this regard especially Regulation (EU) 2016/679 of the European Parliament and of the Council on data protection ("GDPR"). The Data Controller reserves the right to change this information at any time and shall notify you about possible changes in due time.

III. Information concerning data processing:

3.1. Data processing to inform the inquirers (e.g. newsletters)

- a) Purpose of data processing: identifying data subjects and differentiation between them, establishing contact, sending newsletters, sending e-mail newsletters containing business advertisement to inquirers, updates on actual information, events, promotion events, personal offers, keeping contact.
- b) Legal basis for data processing: your voluntarily given consent. However, you are entitled to revoke your consent at any time, although it does not concern the legality of data processing performed before the revocation.
- c) The Data Controller does not forward your personal data to third countries or to international organizations.
- d) Storing duration of the personal data: until the revocation of your consent.
- e) The provision of your personal data is not based on legal regulations or contractual obligations, providing personal data is not a prerequisite for concluding a contract. Consequence of failure to provide data: you will not get notified about our current news.

f) The Data Controller does not use automated decision making in the course of processing your personal data.

3.2. Data processing in connection with registration to events:

- a) Purpose of data processing: registration to events, sharing information in connection with the event, keeping contact, implementation of the arrangement.
- b) Legal basis for data processing: the performance of the contract made between the Data Controller and you, including data processing related to the steps taken at the request of the data subject prior to entering into a contract.
- c) Addressees to whom your personal data is disclosed: the employees and agents/subcontractors participating in the performance of the event but only to the extent required for the performance of their duties.
- d) The Data Controller does not forward your personal data to third countries or to international organizations.
- e) Storing duration of the personal data: The Data controller processes your personal data until the last day of the eighth (8th) year as of the conclusion of the contract between you and the Data Controller.
- f) The provision of your personal data is not based on contractual obligations. Consequence of failure to provide data: you cannot participate in the event.
- g) The Data Controller does not use automated decision making in the course of processing your personal data.

3.3. Data processing related to photograhing and video recording in the events:

- a) Purpose of data processing: documentation and advertisement of the event.
- b) Scope of the processed data: your image recorded on the photo, your voice and other personal data.
- c) Legal basis for data processing: your voluntarily given consent. However, **you are entitled to revoke your consent at any time**, although it does not concern the legality of data processing performed before the revocation.
 - During the event the data controller provides places where the data controller or the agent of the data controller will not make recordings (camera free area). You are giving your consent to the recording by conduct if you do not use the camera free area.
- d) Addressees to whom your personal data is disclosed: the employees and agents/subcontractors participating in the performance of the event but only to the extent required for the performance of their duties.
- e) The Data Controller does not forward your personal data to third countries or to international

organizations.

- f) Storing duration of the personal data: until the revocation of your consent.
- g) The provision of your personal data is not based on contractual obligations.
- h) The Data Controller does not use automated decision making in the course of processing your personal data.

3.4. Processing "Functional cookies" related to the webpage www.greenfoxacademy.hu

- a) Purpose of data processing:
 - o The development of the Data Controller's webpage
 - o Improvement of the user experience
 - o Tracking of the usage of the Data Controller's webpage
 - o Providing chat service (cfduid*; wplc*)
 - o Page running (icl*; wp-*)
 - o Webshop (woocommerce*)
 - o Optimonk (OptiMonk*)
 - o Anonym statistical data collection, Google Analytics (ga, gid, NID)
- b) Legal basis for data processing: your voluntarily given consent. However, **you are entitled to revoke your consent at any time**, although it does not concern the legality of data processing performed before the revocation.
- c) Addressees to whom your personal data is disclosed: -.
- d) The Data Controller does not forward your personal data to third countries or to international organizations.
- e) Storing duration of the personal data: until the revocation of your consent.

The data subject can delete the cookie from their own computer and can turn off cookies in their browser. Management of cookies is generally available in the Tools/settings menu of browsers, under Data protection settings, under the name cookies.

You can find further information on cookie deletion under the following links:

- Firefox: <u>https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-yourcomputer</u>
- Chrome: https://support.google.com/chrome/answer/95647
- Internet Explorer: http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#ie=ie-11
- Mozilla: https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito
- Safari: https://support.apple.com/kb/ph21411?locale=en US
- f) The provision of your personal data is not based on legal regulations or contractual obligations, providing personal data is not a prerequisite for concluding a contract. Consequence of failure to provide data: You cannot use the webpage and its functions and services or you can use them

only with limitations.

g) The Data Controller does not use automated decision making in the course of processing your personal data.

3.5. Processing "Operational cookies" related to the webpage www.greenfoxacademy.hu

- a) Purpose of data processing:
 - o Support the proper funcionality of the Data Controller's webpage
 - o Simplification of the usage of the webpage
- b) Legal basis for data processing: the legitimate interests of the Data Controller. This legitimate interest is the proper operation of the Data Controller's webpage.

ATTENTION! You have the right to object against this data processing, in which case the Data Controller continues processing only if the Data Controller demonstrates compelling legitimate grounds for the processing which override your interests and rights based on the assessment of the Data Controller.

- c) Addressees to whom your personal data is disclosed: -.
- d) The Data Controller does not forward your personal data to third countries or to international organizations.
- e) Storing duration of the personal data: in case of session cookies, the Data Controller stores the cookies until the end of the session, in case of usage assisting cookies the processing takes place for three (3) months.
- f) The provision of your personal data is not based on legal regulations or contractual obligations, providing personal data is not a prerequisite for concluding a contract. Consequence of failure to provide data: You cannot use the webpage and its functions and services or you can use them only with limitations.
- g) The Data Controller does not use automated decision making in the course of processing your personal data.

IV. Your rights concerning data processing:

You also have the following rights concerning the processing of your personal data:

ATTENTION! The GDPR contains numerous detailed regulations that the Data Controller shall comply with, however for the transparency and clarity of this Data Processing Information, only the essence of these regulations is summarized herein. In case you have any questions please turn to the Data Controller under the contact details as set forth in section I, and the Data Controller will gladly give you further information on your rights.

4.1. Right to access:

You have the right to receive feedback from the Data Controller concerning whether the processing of your personal data is in progress, and if such data processing is in progress, then you have the right to receive information on the following:

- the categories of the processed personal data;
- the legal basis;
- the data processing purpose;
- the duration of the data processing;

furthermore,

- to whom, when, and under what laws and regulations the Data Controller provided access to your personal data or for whom the Data Controller transferred such data;
- what is the source of your personal data;
- whether the Data Controller applies automated decision-making, the logic involved, including profiling.

At your request the Data Controller provides you a copy of the personal data being processed free of charge for the first request. The Data Controller might charge a reasonable amount of fee for additional copies you might request, based on administrative costs. Please note that the right to obtain a copy referred herein shall not adversely affect the rights and freedoms of others.

To comply with data protection requirements and to protect your rights, the Data Controller has to make sure that your identity and the identity of the natural person making the request is the same, for this purpose Your identification may be required to give you information, let you access to personal data, and to provide the copy of your personal data

4.2. Right to correction

You have the right to ask the Data Controller through its contact details to correct the inaccurate personal data concerning you. In case you can verify the accuracy of the corrected personal data, the Data Controller fulfills the request within one month and also notifies you.

4.3. Right to deletion

In connection with the data processing purposes in sections 3.1. and 3.3. you have the right to ask the deletion of your data, in which case the Data Controller deletes the personal data concerning you without unreasonable delay.

In connection with the data processing purpose in sections 3.2. at your request the Data Controller deletes the data if the Data Controller no longer needs the personal data for the purposes of the collection or the processing by other means.

In connection with the data processing purposes in sections 3.4., 3.5., the Data Controller measures whether there are compelling legitimate grounds for the processing which override the interests, rights

and freedoms of the data subject or for the establishment, exercise or defence of legal claims. In case there are no such reasons, than the Data Controller deletes the personal data concerning you without unreasonable delay.

4.4. Right to the limitation of data processing

You have the right to have data processing limited (expressly marking the limited processing and providing separated processing from other data) by the Data Controller at your request if any of the following requirements is met:

- you dispute the accuracy of personal data; in this case the limitation is for the period necessary for the Data Controller to check the accuracy of personal data;
- the data processing is illegal and you do not request the deletion of data, requesting the limitation of using the same instead;
- the Data Controller does not need the personal data any more for data processing purposes, yet you require such data for submitting, enforcing or defending legal claims; or
- you objected to data processing; in this case the limitation is for the period necessary to establish whether the rightful reasons of the Data Controller enjoy priority over the rightful interests of the data subject.

4.5. Right to objection

In connection with the data processing purpose in section **3.5.** you have right to objection, in this case the Data Controller continues processing only if the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims, based on the assessment of the Data Controller.

4.6. Right to the mobility of data

In connection with the data processing purposes in section **3.1.-3.4.** you have right to the mobility of data if the processing is carried out by automated means.

On the basis of this right, you have the right to receive the personal data concerning you, which you have provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Data Controller in connection with the processing carried out by automated means.

4.7. Procedural rules applicable to the Data Controller in the case of exercising your rights:

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

The Data Controller shall inform you about measures taken as the result of your request aimed at exercising your right without unreasonable delay but within one month at the most from the reception of

the request. This deadline may be extended by an additional two months, considering the complexity of the request and the number of requests, if applicable, about which you shall be informed. The Data Controller 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, except if you request otherwise.

If the Data Controller does not take measures as the result of your request, it 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 that you may file complaints at any supervisory authority and may exercise your right to judicial remedy.

The Data Controller provides the information and the measure taken free of charge. If your request is clearly unfounded or excessive – especially due to its repeated nature – the Data Controller, considering the administrative costs of providing the requested information or taking the requested measure, may charge a reasonable amount of fee for the administrative costs, or may refuse taking measures based on the request. Proving the clearly unfounded or excessive nature of the request is the burden of the Data Controller.

The Data Controller informs all addressees to whom the personal data was disclosed about all corrections, deletions or limitations of data processing, except if it proves impossible or would require a disproportionate amount of effort. At your request the Data Controller shall inform you about such addressees.

V. Your right to legal remedy:

5.1. Complaint addressed to the Data Controller:

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

5.2. Right to judicial remedy:

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

The procedure against the Data Controller or data processor shall be initiated before a court of the member state according to the place of activity of the Data Controller 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 the data controller or data processor is a public authority of a member state acting under its public power.

5.3. Complaint addressed to the Data Protection Authority:

You have the right to file a complaint at a regulatory authority – especially in the European member state according to your usual place of residence, your workplace or the location of the assumed infringement – if, in your opinion, the processing of personal data concerning you violates the GDPR regulation or other legal regulations. The regulatory 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 Hungarian National Authority for Data Protection and Freedom of Information as regulatory authority:

Name: Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti

Adatvédelmi és Információszabadság Hatóság)

Registered office: 1055 Budapest, Falk Miksa utca 9-11.

Mail address: 1363 Budapest, Pf.: 9.

Telephone: 06 1 391 1400 Fax: 06 1 391 1410

E-mail: <u>ugyfelszolgalat@naih.hu</u> Website: <u>http://www.naih.hu</u>

VI. Data security:

The Data Controller obliges itself to employ adequate and efficient physical, IT, organizational and administrative measures to preserve confidentiality, integrity and availability of your personal data.

Green Fox Academy Kft.
Data Controller