## DATA MANAGEMENT INFORMATION

#### 1. INTRODUCTION

The Barral Institute Hungary Ltd (hereinafter referred to as the "Service Provider" or "Controller"), as a data controller, pays great attention to the protection of the personal data of its customers and partners and attaches great importance to respecting the right of information self-determination of its customers.

Thank you for trusting us with your data. Your data will always be treated with the utmost care and in accordance with our data protection principles.

We undertake to ensure that all processing of data relating to our activities complies with the requirements set out in this Policy and in the applicable national legislation and European Union acts.

A privacy policy relating to our data processing is available on an ongoing basis at <a href="https://www.barral.hu/data-protection">www.barral.hu/data-protection</a> The Barral Institute Hungary Ltd sets out its data management practices below.

# 2. THE SCOPE OF DATA CONTROLLERS: Barral Institute Hungary Ltd:

2100 Gödöllő Komáromi utca 19, Hungary Tax Nr.: 32649367-1-13

E-mail: orsi.varga@barral.hu Phone: +36 (30) 3240693

Website: www.barral.hu

#### **Senior Data Protection Officer:**

Name: Orsolya Elekné Varga E-mail: orsi.varga@barral.hu Phone: +36 (30) 3240693

### 3. THE LAW ON WHICH THE PROCESSING IS BASED

Our data management principles comply with the applicable data protection legislation, in particular:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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, GDPR)
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv.)
- Act V of 2013 on the Civil Code (Civil Code)

- Act VI of 1998 on the Protection of Individuals with regard to Automatic Processing of Personal Data.
- The provisions of Chapter VIII of Act XL of 2001 on Communications.

# 4. THE SCOPE OF THE PERSONAL DATA, THE PURPOSES, PURPOSES, PURPOSES AND DURATION OF THE PROCESSING

The data processing of the Anglofon Group's activities is based on voluntary consent, legal obligations (legal authorisation) and, in some cases, on the consideration of legitimate interest. In the case of processing based on voluntary consent, data subjects may withdraw their consent at any stage of the processing. In certain cases, the processing, storage and transmission of some of the data provided may be required by law and we will inform our customers separately.

Please note that if you do not provide your own personal data, you as the data controller are obliged to obtain the consent of the data subject.

#### 4.1 PROCESSING OF DATA RELATED TO EDUCATIONAL ACTIVITIES

Scope of data processed	Purpose of data processing
Name of training participant*	Providing extracurricular, traditional classroom-based, training Verification of obligations and entitlements in relation to the contract, enforcement and recovery of any claims arising from the contract.  Maintaining contacts and monitoring the services provided.
Your e-mail address*	
Phone number*	
Company name (training cost)	
Billing data	
Date and place of birth	To submit the data required by the National Statistical Data Protection Programme (OSAP) or to conclude an adult education contract. And data required for accredited course
Mother's maiden name	
Address*	
Nationality	
ID/ passport number	
Highest level of education	
Occupation*	Assessment of the input competences required to start training
Date and place of previous BI class(if any)	For input competences in case of advanced level classes

Data marked with \* will be transferred to the Barral Institute after completion of the training. The student can declare in the training contract if he does not want his/her data to be published in the international therapist database (www.iahp.com). If the student does not declare this, his/her data will be automatically added to the database.

Legal basis for data processing: the data subject's voluntary consent (application phase) or in the case of a contractual relationship (ordering a service), legal obligation (legal authorisation) and legitimate interest (based on the data provided, we can offer the student the appropriate educational programme to achieve his/her development goal.)

**Deadline for data erasure**.until the withdrawal of consent, but at least 8 years from the performance of the service accordance with Section 169(2) of the Act on the Payment of Bills of Accounts

#### 4.2 DATA MANAGEMENT OF BARRAL, HU

When you visit our website anglofon.com the web server does not record any user data. Our web server uses a browser-based identifier and does not store IP addresses.

For our website's web analytics, targeted online advertising, we use - like most websites - a third party IT solution (Google). In this case we use cookies and tags. These are small text files that are stored on your computer or mobile device. These allow Google to use its own data management and algorithm to serve targeted ads to the user and provide global information about the visitor's habits on our website. We do not have access to the data collected by Google at the level of the individual user (only Google), so no personal data is processed on our part.

The user can delete

the cookie from their computer or disable the cookies in their browser. In general, cookies can be managed by going to the browsers' /Tools/Preferences menu, Privacy/Preferences/Custom Settings menu, and selecting the cookie, cookie or tracking option. However, when cookies are deleted or disabled, the user may lose the possibility to access relevant information and offers.

#### 4.3 OTHER DATA PROCESSING

#### **4.4.1 TELEPHONE CONVERSATIONS**

Telephone conversations are not recorded.

## 4.4.2 CUSTOMER CORRESPONDENCE

If you wish to contact us by electronic or postal mail, the Barral Institute Hungary Ltd will delete any correspondence received, together with the sender's name, e-mail and/or postal address, date, time and other personal data provided in the message, after a maximum of 10 years from the date of the communication.

## 5. THE WAY PERSONAL DATA ARE STORED AND THE SECURITY OF PROCESSING

Our computer systems and other data storage locations are located at our headquarters (2100 Gödöllő Komáromi utca 19.) and at our data processors. We take appropriate measures to protect the data, in particular against unauthorised access, alteration, disclosure, disclosure, deletion or destruction, accidental destruction, damage and loss of accessibility due to changes in the technology used.

We undertake to ensure that, taking into account the state of the art, we implement technical, organisational and organisational measures to protect the security of data processing that offer a level of protection appropriate to the risks associated with the processing.

## We will retain it during the processing:

- a. confidentiality: we protect information so that only those who are entitled to it have access to it;
- b. integrity: we protect the accuracy and completeness of the information and the way it is processed;
- c. availability: we make sure that when an authorised user needs it, they can actually access the information they want and have the tools to do so.

As a data controller, we undertake to maintain strict confidentiality of the personal data we process, without time limitation, and we will not disclose it to any third party without your consent.

#### 6. DATA PROCESSING

As a Data Processor, we use the services of the following Data Processors:

Rackhost Zrt 6722 Szeged Tisza Lajos körút 41, Hungary

Sales Autopilot Kft. H-1024 Budapest, Margit krt. 31-33. / 4. Hungary

#### 7. DATA SUBJECTS' RIGHTS, REMEDIES

You may request information about the processing of your personal data, request the rectification, erasure or withdrawal of your personal data, except for mandatory processing, and exercise your right to data portability and objection in the manner indicated when you collected the data or by contacting the controller (section 2 of this document).

### 7.1 RIGHT TO REQUEST INFORMATION, RIGHT OF ACCESS:

You have the right to receive feedback from us as to whether your personal data is being processed and, if such processing is taking place, you have the right to access your personal data and the information listed in the Regulation.

Data subjects may, after verifying their identity, request information through our contact details indicated in point 2, in order to

- what personal data they provide,
- on what legal basis,
- for what purpose,
- from what source,
- how long we store it.

#### 7.2 RIGHT TO RECTIFICATION:

You may request the correction of inaccurate personal data concerning you or the completion of incomplete data.

#### 7.3 RIGHT TO ERASURE:

You can request, through the contact details we have provided, that we delete personal data about you without undue delay. Deletion of data cannot be initiated if we are required by law to continue to store the personal data.

#### 7.4 RIGHT TO BLOCKING:

You may restrict the processing of your data, for example, if you believe that we have unlawfully processed your data. The blocking lasts as long as the reason you have given makes it necessary to store the data.

#### 7.5 RIGHT TO DATA RETENTION:

You have the right to receive personal data about you that you have provided to us in a structured, commonly used, machine-readable format and to have that data transferred to another data controller.

## 7.6 RIGHT TO OBJECT:

You have the right under the Data Protection Regulation to object to the processing of your personal data if we transfer or use your personal data for direct marketing, public opinion polling or scientific research (but we do not do so under our Privacy Policy). If you object, we may no longer process your personal data unless we have compelling legitimate grounds for doing so which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

## 7.7 RIGHT OF WITHDRAWAL:

You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

#### 8. REMEDY

If you have a problem with data protection, you can contact:

#### 8.1 COMPLAIN TO OUR SENIOR DATA PROTECTION OFFICER:

If you have a problem with our data processing, please contact our Data Protection Officer at <a href="mailto:orsi.varga@barral.hu">orsi.varga@barral.hu</a>

#### 8.2 RIGHT TO APPLY TO THE COURTS:

If your rights are infringed, you can take legal action. The court will decide the case out of turn.

#### 8.3 DATA PROTECTION AUTHORITY PROCEDURE:

You can also lodge a complaint with the National Authority for Data Protection and Freedom of Information:

- a. Name: National Authority for Data Protection and Freedom of Information
- b. Website: <a href="www.naih.hu">www.naih.hu</a>c. Phone: +36(1)391-1400
- d. E-mail: ugyfelszolgalat@naih.hu