*The following translation is for information purposes only. The relevant Privacy Policy is the* [*Privacy Policy in Hungarian*.](https://kurtakademia.hu/adatvedelem/)

1. INTRODUCTION

The KÜRT Academy Ltd. (headquarters: 1126 Budapest, Dolgos utca 2/E 1/B. 5. floor. 16., company registration number: 01-10-141665; court of registration: Budapest District Court, Court of Registration; hereinafter referred to as "KÜRT Academy Ltd..", "service provider", "data controller"), as data controller, acknowledges the contents of this information as binding upon itself. It undertakes to ensure that its processing of data relating to its services meets the requirements set out in this notice.

The legal guidelines governing the www.kurtakademia.hu portal are permanently available at /data protection/. KÜRT Academy Ltd. reserves the right to modify this information at any time and will inform its audience of any changes in due time. If our users have any questions that are not clear from this notice, please contact us and we will answer them.

KÜRT Academy Ltd. is committed to maintaining the highest quality of service. The KÜRT Academy Ltd. is committed to protecting the personal data of its partners and users, and attaches the utmost importance to respecting the right of information self-determination of its customers. KÜRT Academy Ltd. treats personal data confidentially and takes all security, technical and organisational measures to guarantee the security of the data.

KÜRT Academy Ltd. sets out below its data management principles and the expectations it has set for itself as a data controller and which it complies with. Its data management principles are in accordance with the applicable data protection legislation, in particular the following:

- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter referred to as the Data Protection Act);

- 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 (hereinafter referred to as the Regulation);

- Act LXVI of 1992 - on the registration of personal data and addresses of citizens;

- Act CXIX of 1995 on the processing of name and address data for the purposes of research and direct marketing (DM Act);

- Act CVIII of 2001 - on certain aspects of electronic commerce services and information society services;

- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Commercial Advertising Activities (Act XLVIII of 2008)

2. DEFINITIONS

2.1. data subject: any specified natural person who is identified or identifiable, directly or indirectly, on the basis of personal data;

2.2. personal data: data which can be associated with the data subject, in particular the name, the identification mark and one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of the data subject, and the inference which can be drawn from the data concerning the data subject;

2.3. consent: a freely given and freely given indication of the data subject's wishes, based on adequate information, by which he or she signifies his or her unambiguous agreement to the processing of personal data relating to him or her, whether in full or in part;

2.4. objection: a statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data;

2.5. controller: the natural or legal person or unincorporated body which, alone or jointly with others, determines the purposes for which the data are processed, takes and implements decisions regarding the processing (including the means used) or has the data processed by a processor;

2.6. data processing: whatever the method used, any operation or set of operations which is performed upon the data, in particular any collection, recording, recording, organisation, storage, alteration, use, retrieval, disclosure, transmission, alignment or combination, blocking, erasure or destruction of data, prevention of further use, taking of photographs, sound recordings or images, or any other physical means of identification of a person (e.g. fingerprints, palm prints, DNA samples, iris scans);

2.7. transfer: when the data are made available to a specified third party;

2.8. disclosure: where the data are made available to any person;

2.9. erasure: rendering data unrecognisable in such a way that it is no longer possible to retrieve it;

2.10. 'data blocking' means the marking of data with an identification mark in order to limit their further processing permanently or for a limited period of time;

2.11. 'data destruction' means the total physical destruction of a data medium containing data;

2.12. 'data processing' means the performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data;

2.13. data processor: a natural or legal person or unincorporated body which processes data on the basis of a contract, including a contract concluded pursuant to a legal provision. The data processor is also the service provider operating the website of KÜRT Academy Ltd. and the staff of the service provider performing or supporting online marketing activities;

2.14. third party: any natural or legal person or unincorporated organisation other than the data subject, the controller or the processor;

2.15. third country: any country which is not a member of the European Economic Area.

2.16. Cookie: a text file of no more than 4 kilobytes in size that is stored on our computer by the Internet browser software of the servers we visit. Its function is to make surfing more convenient by allowing us to store various personal data, passwords, etc. It can be used to personalise websites and, knowing your surfing history, to target advertising campaigns.

3. PRINCIPLES OF DATA MANAGEMENT BY THE KÜRT ACADEMY LTD.

3.1,

if

a) with the consent of the data subject, or

b) it is ordered by law or, on the basis of a statutory authorisation and within the scope specified therein, by a decree of a local authority for a purpose in the public interest.

The consent or subsequent approval of the legal representative of a minor aged 16 or over is not required for the validity of a declaration of consent by the minor concerned.

3.2. The processing must comply with this purpose at all stages and the collection and processing of data must be fair and lawful. Only personal data which is necessary for the purpose of the processing, adequate for the purpose, limited in scope and for the time necessary for the purposes for which it is processed may be processed.

3.3 Personal data may only be processed with appropriate informed consent. The data subject must be informed, in a clear, plain and detailed manner, of all the facts relating to the processing of his or her data, in particular the purposes and legal basis of the processing, the identity of the controller and processor, the duration of the processing and the persons who may access the data. The information shall also cover the rights and remedies of the data subject with regard to the processing.

4. KÜRT ACADEMY LTD. DATA PROCESSING RULES

4.1:

a) The legal basis for data processing may be your informed consent in accordance with Article 5(1)(a) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as the "Data Protection Act") and Article 6(1)(a) of the Regulation. Your consent is voluntary. By giving your consent, you agree that Kürt Academy Ltd.. may process personal data concerning you, including images of you (hereinafter collectively referred to as "Data"), for the purposes specified in advance, in particular to collect, record, store, use or delete the Data, in accordance with the provisions of this Privacy Policy.

(b) Some processing may be necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract (Article 6(1)(c) of the Regulation).

(c) Certain processing operations are based on the fulfilment of a legal obligation to which the controller is subject (Article 6(1)(c) of the Regulation). For such processing operations, the controller does not seek your consent because the processing is necessary for compliance with a binding legal obligation to which the controller is subject.

If you wish to request the deletion of your data, please send your request to the following email address: kurtakademia@kurtakademia.hu.

In the case of processing based on the data subject's consent, the data subject shall give his or her consent to the processing of his or her personal data by electronic means, by sending an e-mail to KÜRT Academy Ltd.. / on its website, by checking a box, or by making the relevant technical settings when using information society services, as well as by any other statement or action that unambiguously indicates the data subject's consent to the intended processing of personal data in the given context.

Silence, ticking a box or inaction does not constitute consent.

Consent covers all processing activities carried out for the same purpose or purposes. If the processing serves more than one purpose at the same time, the consent shall be obtained for all processing purposes by KÜRT Academy Ltd.. Where the data subject gives his or her consent following an electronic request by KÜRT Academy Ltd., the request by KÜRT Academy Ltd. must in any case be clear, concise and not unnecessarily restrict the use of the service for which KÜRT Academy Ltd. is seeking consent.

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of the processing based on consent prior to its withdrawal. Before giving consent, the data subject shall be informed thereof by KÜRT Academy Ltd.. KÜRT Academy Ltd. shall make it possible to withdraw consent in the same simple manner as it is made possible to give it.

If the personal data have been collected with the consent of the data subject, KÜRT Academy Ltd. may process the collected data for the purpose of fulfilling a legal obligation to which the data subject is subject, unless otherwise provided by law, without further specific consent and even after the withdrawal of the data subject's consent.

4.2 Identity of the Data Controller and Data Processor:

The Data is processed by KÜRT Academy Ltd.. as the Data Controller.

4.3 Duration of processing:

The processing of the Data shall last for an indefinite period of time, but not longer than until you prohibit the use of the Data for the purpose of the processing or you request the termination of the processing of the Data.

4.4 Persons having access to the Data:

The employees and the respective representatives of KÜRT Academy Ltd.. authorised to register companies are entitled to access the Data.

5. DATA SUBJECTS' RIGHTS:

5.1. Right to information

5.1.1.1 The data subject has the right to be informed by KÜRT Academy Ltd. of the information related to the processing of his/her data before the start of the activity concerning the processing of his/her data.

5.1.2:

- the name and contact details of KÜRT Academy Ltd. and its representative;

- the purposes for which the personal data are intended to be processed and the legal basis for the processing;

- in the case of processing based on legitimate interests, an indication of the legitimate interests of KÜRT Academy Ltd. or a third party;

- where applicable, the recipients or categories of recipients of the personal data;

- the fact if KÜRT Academy Ltd. intends to transfer the personal data to a third country or an international organisation

5.1.3 In addition to the information referred to in point 5.1.2, KÜRT Academy Ltd. shall, at the time of obtaining the personal data, in order to ensure fair and transparent processing, provide the data subject with the following additional information:

- the duration of the storage of the personal data or, if this is not possible, the criteria for determining this duration;

- the right of the data subject to request access to, rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data, as well as the right to data portability;

- in the case of processing based on the data subject's consent, the right to withdraw consent at any time without prejudice to the lawfulness of the processing carried out on the basis of consent prior to its withdrawal;

- the right to lodge a complaint with a supervisory authority;

- whether the provision of the personal data is based on a legal or contractual obligation or is a precondition for the conclusion of a contract, whether the data subject is under an obligation to provide the personal data and the possible consequences of not providing the data;

- the fact of the automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation and, at least in these cases, clear information on the logic used and the significance of such processing and its likely consequences for the data subject.

5.1.4 If KÜRT Academy Ltd. intends to carry out further processing of personal data for purposes other than those for which they were obtained, it shall inform the data subject of that other purpose and of any relevant additional information referred to in points 1.2 and 1.3 prior to the further processing.

5.2 Right of access of the data subject

5.2.1 The data subject has the right to obtain from KÜRT Academy Ltd. feedback as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to access the personal data and the following information (Article 15 of the Regulation):

- the purposes of the processing;

- the categories of personal data concerned;

- the recipients or categories of recipients to whom or with whom the personal data have been or will be disclosed by KÜRT Academy Ltd. including, in particular, recipients in third countries or international organisations;

- where applicable, the envisaged period of storage of the personal data or, if this is not possible, the criteria for determining that period;

- the data subject's right to obtain from KÜRT Academy Ltd.. the rectification, erasure or restriction of the processing of personal data concerning him or her and to object to the processing of such personal data;

- the right to lodge a complaint with a supervisory authority;

- if the data have not been collected by KÜRT Academy Ltd. from the data subject, any available information on their source;

- the fact of automated processing referred to in Article 22(1) and (4) of the Regulation, including profiling, and, at least in these cases, clear information on the logic used and the significance of such processing and its likely consequences for the data subject.

5.2.2 Where personal data are transferred to a third country or an international organisation, the data subject shall have the right to be informed of the appropriate safeguards for the transfer in accordance with Article 46.

5.2.3. For additional copies requested by the data subject, KÜRT Academy Ltd. may charge a reasonable fee based on administrative costs. If the data subject has submitted the request by electronic means, the information shall be provided by KÜRT Academy Ltd. in a commonly used electronic format, unless the data subject requests otherwise.

5.3. Right to rectification

5.3.1 The data subject has the right to have inaccurate personal data concerning him or her corrected by KÜRT Academy Ltd. without undue delay upon request.

5.3.

5.4 Right to erasure ("right to be forgotten")

5.4.1 The data subject shall have the right to have personal data concerning him or her erased by KÜRT Academy Zrt. without undue delay upon his or her request, and KÜRT Academy Ltd. shall be obliged to erase personal data concerning him or her without undue delay if:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by KÜRT Academy Ltd;

- the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;

- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;

- the personal data have been unlawfully processed by KÜRT Academy Ltd.;

- the personal data must be erased in order to comply with a legal obligation under EU or Member State law applicable to KÜRT Academy Ltd.;

- the personal data were collected in connection with the provision of information society services referred to in Article 8(1) of the Regulation.

5.4.2 The right to erasure may not be exercised if the processing is necessary:

◦ for the exercise of the right to freedom of expression and information;

◦ to comply with an obligation under EU or Hungarian law applicable to KÜRT Academy Ltd. that requires the processing of personal data, or for reasons of public interest;

◦ in the public interest in the field of public health;

◦ for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, where the right of erasure would be likely to render impossible or seriously jeopardise such processing; or

◦ for the establishment, exercise or defence of legal claims.

5.5 Right to restriction of processing

5.5.1 Where processing is restricted, such personal data, with the exception of storage, may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

5.5.2 The data subject shall be entitled to have the data processing restricted by KÜRT Academy Ltd.. at his or her request if one of the following conditions is met:

◦ the data subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow KÜRT Academy Ltd. to verify the accuracy of the personal data;

◦ the processing by KÜRT Academy Ltd.. is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;

◦ KÜRT Academy Ltd. no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or

◦ the data subject has objected to the processing; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of KÜRT Academy Ltd.. prevail over the legitimate grounds of the data subject.

5.5.3.

5.6. Obligation to notify the rectification or erasure of personal data or the restriction of processing

5.6.1.

5.7 Right to data portability

5.7.1 The data subject shall have the right to receive personal data concerning him or her which he or she has provided to KÜRT Academy Ltd. in a structured, commonly used, machine-readable format, and the right to transmit such data to another controller without hindrance by KÜRT Academy Ltd. if:

◦ the processing is based on consent or a contract; and

◦ the processing is carried out by automated means.

5.7.3. The exercise of the right to data portability shall be without prejudice to Article 17 of the Regulation (right to erasure). The right to data portability shall not apply where the processing is in the public interest. This right must not adversely affect the rights and freedoms of others.

5.8. The right to object

5.8.1 The data subject has the right to object at any time, on grounds relating to his or her particular situation, to processing of personal data carried out in the exercise of official authority or in the public interest, or to processing necessary for the purposes of the legitimate interests pursued by KÜRT Academy Ltd. or by a third party (processing based on Article 6(1)(e) or (f) of the Regulation), including profiling based on the aforementioned provisions. In such a case, KÜRT Academy Ltd. may no longer process the personal data, unless KÜRT Academy Ltd. proves that the processing is justified by compelling legitimate grounds which override the interests, rights and freedoms of the data subject or are related to the establishment, exercise or defence of legal claims.

5.8.2. Where personal data are processed by KÜRT Academy Ltd. for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such purposes, including profiling, insofar as it relates to direct marketing. If the data subject objects to the processing of personal data for direct marketing purposes, the personal data will no longer be processed for these purposes by KÜRT Academy Ltd..

5.8.3.

5.8.4. The data subject may also exercise the right to object by automated means based on technical specifications.

5.8.5.

5.9 Right not to be subject to automated decision-making

5.9.1 The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

5.9.2 Clause 5.9.1 does not apply where the decision:

◦ necessary for the conclusion or performance of a contract between the data subject and KÜRT Academy Ltd.;

◦ it is permitted by Union or Hungarian law applicable to the controller, which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or

5.9.3. is based on the explicit consent of the data subject.

5.9.3 In the cases referred to in points 5.9.2(a) and (c), KÜRT Academy Ltd. shall take appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, including ensuring that the data subject may request human intervention by KÜRT Academy Ltd., express his or her views and object to the decision.

5.9.4 The decisions referred to in point 5.9.2 shall not be based on the special categories of personal data referred to in Article 9(1) of the Regulation, unless Article 9(2)(a) or (g) applies and appropriate measures have been taken to safeguard the rights, freedoms and legitimate interests of the data subject.

5.10. Right of the data subject to lodge a complaint and seek redress

5.10.1 Right to lodge a complaint with the supervisory authority: the data subject has the right to lodge a complaint with the supervisory authority under Article 77 of the Regulation if the data subject considers that the processing of personal data relating to him or her infringes the Regulation. The supervisory authority with which the complaint has been lodged is obliged to inform the data subject of the procedural developments and the outcome of the complaint, including the right to judicial remedy under Article 78 of the Regulation.

The right to lodge a complaint can be exercised by the data subject using the following contact details:

National Authority for Data Protection and Freedom of Information.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone: +36 (1) 391-1400;

Fax: +36 (1) 391-1410

Website: http://www.naih.hu

e-mail: ugyfelszolgalat@naih.hu

5.10.2 Right to an effective judicial remedy against the supervisory authority: without prejudice to other administrative or non-judicial remedies, all natural and legal persons have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning them. Without prejudice to any other administrative or non-judicial remedy, any person concerned shall have the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the person concerned within three months of the procedural developments concerning the complaint lodged under Article 77 of the Regulation or of the outcome of the complaint. Proceedings against the supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

5.11. Information about the data breach

5.11.1 If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, KÜRT Academy Ltd. shall inform the data subject of the personal data breach without undue delay.

5.11.2. In the information provided to the data subject referred to in point 5.11.1, KÜRT Academy Ltd. shall clearly and plainly describe the nature of the personal data breach and shall at least provide the following information:

◦ the name of the Data Protection Officer or other contact person who will provide further information;

◦ the likely consequences of the personal data breach;

◦ the measures taken or envisaged by KÜRT Academy Ltd to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

5.11.3 The data subject shall not be informed by KÜRT Academy Ltd. if any of the following conditions are met:

◦ KÜRT Academy Ltd. has implemented appropriate technical and organisational protection measures and has applied those measures to the data affected by the personal data breach, in particular measures, such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;

◦ KÜRT Academy Ltd.. has taken additional measures following the data breach to ensure that the rights and freedoms of the data subject are not violated.

◦ freedoms referred to in point 11.1 are no longer likely to materialise;

the provision of information would require a disproportionate effort. In such cases, the data subject shall be informed by KÜRT Academy Ltd.. by means of publicly disclosed information or by taking similar measures to ensure that the data subject is informed in a similarly effective manner.

5.12. Procedure to be followed in the event of a request by the data subject

5.12.1. The KÜRT Academy Ltd shall facilitate the exercise of the rights of the data subject and shall not refuse to comply with a request to exercise the rights of the data subject, including those set out in this Policy, unless it proves that it is not possible to identify the data subject.

The data subject may send any request or query regarding the processing to the following address:

◦ by post to the following address: ◦ by post to the address at building E, 1/B, V. floor 16, Dolgos utca 2, 1126 Budapest, Hungary

◦ electronically to info@kurtakademia.hu

KÜRT Academy Ltd. will send its reply without delay, but within 30 days at the latest, to the address specified by the data subject.

5.12.2 KÜRT Academy Ltd. shall inform the data subject of the measures taken in response to the request without undue delay, but in any event within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. KÜRT Academy Ltd.. shall inform the person concerned of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay.

5.12.3 If the data subject has submitted the request by electronic means, the information shall be provided by KÜRT Academy Ltd. electronically, unless the data subject requests otherwise.

5.12.4 If KÜRT Academy Ltd. does not take action on the request of the data subject, it shall inform the data subject without delay, but at the latest within one month of receipt of the request, of the reasons for the failure to take action and of the possibility for the data subject to lodge a complaint with the supervisory authority and to exercise his or her right of judicial remedy.

5.12.5 The KÜRT Academy Ltd. shall provide the data subject free of charge with the information detailed in Articles 13 and 14 of the Regulation and the information and measures provided for in Articles 15 to 22 and 34 of the Regulation (feedback on the processing of personal data, access to the processed data, rectification, integration, erasure, restriction of processing, data portability, objection to processing, notification of a personal data breach).

5.12.6 If the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, KÜRT Academy Ltd. may, taking into account the administrative costs of providing the requested information or taking the requested action, charge a fee of HUF 5,000 or refuse to take action on the basis of the request.

The burden of proving that the request is manifestly unfounded or excessive shall lie with KÜRT Academy Ltd..

If KÜRT Academy Ltd. has reasonable doubts as to the identity of the natural person submitting the request pursuant to Articles 15-21 of the Regulation, it may request further information necessary to confirm the identity of the person concerned.\*\*\*

6. THE PURPOSES FOR WHICH THE DATA ARE PROCESSED:

A.) EVENT AND OPEN DAY REGISTRATION

sending informative and promotional offers by e-mail and post concerning the training courses available. Open Day registration is periodically available by registering on www.kurtakademia.hu. The personal data provided at the time of registration are indispensable for contact purposes and for sending information and offers related to the training courses, due to the nature of the mailing. By registering for an open day or other event, you agree that KÜRT Academy Ltd. may take photographs of you during the open day or event and use them as part of its educational and promotional material, without remuneration, for an indefinite period of time, without territorial limitation, in any way it chooses (including, in particular, in Internet advertising, print media, other promotional material), publish them and distribute them in any number of copies.

The legal basis for such processing is your explicit consent.

If you no longer wish to receive informational and promotional offers from KÜRT Academy Ltd.. you can unsubscribe from the newsletter by clicking on the link in the footer of the newsletter and by sending an e-mail to info@kurtakademia.hu.

Please note that the applicant is responsible for the accuracy of the personal data provided. If you provide false data or personal data of another person, you may suffer damage and may be subject to civil, criminal and criminal liability proceedings.

Event and Open Day Registration Registration Registration Number: 03716-0002

B.) APPLICATION FOR TRAINING

You can apply for training courses on the website www.kurtakademia.hu under APPLY. To apply, you will be asked to provide some personal information (e.g. name, address, telephone number, e-mail address, highest level of education, etc.). You may also be required to upload a CV. The personal data provided at the time of application are indispensable for contacting you and for sending you information and offers relating to the training, given the nature of the mailing, for preparing the interview and for completing the training.

The legal basis for the processing is the performance of a contract to which the data subject is a party or the taking of steps prior to the conclusion of the contract.

From time to time, KÜRT Academy Ltd. sends informative and promotional offers concerning the available training courses to the persons applying for the training courses by e-mail or post.

By registering for the training, you agree that KÜRT Academy Ltd. may take photographs of you as part of the training and use them as part of its educational and promotional materials, without remuneration, for an indefinite period of time, without territorial limitation, in any way (including, without limitation, in Internet advertising, print media, other advertising materials), publish them and distribute them in any number of copies.

The legal basis for processing in such cases is your explicit consent.

If you no longer wish to receive informational and promotional offers from KÜRT Academy Ltd.. you can unsubscribe from the newsletter by clicking on the link in the footer of the newsletter and by sending an e-mail to info@kurtakademia.hu.

Please note that the applicant is responsible for the authenticity of the personal data provided. If you provide false data or personal data of another person, you may suffer damage and may be subject to civil, criminal and criminal liability proceedings.

Registration number of the training application: 03716-0001

C.) SUBSCRIBE TO THE NEWSLETTER

You can subscribe to the newsletter at www.kurtakademia.hu. In the form, the user can select the courses of interest, so that he/she will receive only their news in the form of informative and promotional offers by e-mail. The data provided for registration are essential for contact purposes and for sending information and offers on the training courses, given the nature of the mailing.

If you no longer wish to receive informative and promotional offers from KÜRT Academy Ltd.., you can unsubscribe here in the footer of the newsletter sent out by clicking on "If you no longer wish to receive information about our latest events, you can unsubscribe here." you can unsubscribe from the newsletter by clicking on the link in the footer of the newsletter and by sending an e-mail to info@kurtakademia.hu.

Please note that the applicant is responsible for the authenticity of the personal data provided. If you provide false data or personal data of another person, you may suffer damage and may be subject to civil, criminal and criminal liability proceedings.

The legal basis for the processing is the consent of the data subject, which he or she gives by ticking the box next to the text "Subscribe to our newsletter" on the KÜRT Academy Ltd. website after being informed about the processing of his or her data.

The scope of the personal data processed: the name and e-mail address of the natural person.

Purpose of the processing of personal data: to inform the data subject about the services and products of KÜRT Academy Ltd., changes in them, news and events.

The recipients or categories of recipients of personal data: the manager of KÜRT Academy Ltd., employees performing customer service and marketing tasks, employees of the service provider operating the website of KÜRT Academy Ltd. as data processors.

Duration of the storage of personal data: until the newsletter service is maintained or the consent of the data subject is withdrawn. The newsletter can be unsubscribed at any time by clicking on the link in the footer of the e-mails sent to the data subject or by a written declaration or e-mail, which constitutes withdrawal of consent. In such a case, all data of the data subject will be deleted immediately by KÜRT Academy Ltd..

D.) DATA MANAGEMENT IN CONNECTION WITH ORDINANCES, OFFERS, CONTACT USE KÜRT Academy Ltd.. WEB SITE

In order to use certain services available on the website (ordering, requesting an offer) and to contact us, the data subject must voluntarily provide personal data. Accordingly, sending an order or request for a quotation to KÜRT Academy Ltd. or providing data when contacting the company implies voluntary acceptance of the provisions of this Policy and consent to data processing.

The legal basis for data processing is the consent of the data subject based on his/her voluntary data provision, which the data subject gives on the KÜRT Academy Ltd. website by ticking the box next to the text Order / Request for Proposal Contact after being informed about the processing of his/her data.

The data subject is any natural person who gives his/her consent to the processing of his/her personal data on the website of KÜRT Academy Ltd.

The scope of the data processed: name, e-mail address, telephone number of the natural person.

Purpose of the processing of personal data: to provide services on the website, to place an order, to request an offer, to contact the person concerned in preparation for the conclusion of a contract or for any other purpose, such as providing information about KÜRT Academy Ltd. products, services, terms and conditions, promotions.

Recipients and categories of recipients of personal data: the manager of KÜRT Academy Ltd., employees performing customer service and marketing tasks, employees of the service provider operating the website of KÜRT Academy Ltd. as data processors.

Duration of the storage of personal data: until the order or request is fulfilled or until the data subject's consent is withdrawn (deletion at the request of the data subject).

E.) DATA PROCESSING IN CONNECTION WITH DIRECT MARKETING ACTIVITIES

The legal basis for KÜRT Academy Ltd..'s processing of data for direct marketing purposes is the data subject's consent, which is clear and explicit. The data subject gives his or her unambiguous, explicit prior consent by ticking the box next to the text "consent to direct marketing" on the KÜRT Academy Ltd. website or by providing information on the processing of his or her data in the relevant contract of employment.

The data subject is any natural person who gives his or her explicit and unambiguous consent to the processing of his or her personal data by the Company for direct marketing purposes.

The purpose of the processing of personal data is to carry out direct marketing activities related to the activity of KÜRT Academy Ltd., i.e. sending advertising publications, newsletters, current offers in printed (postal) or electronic form (e-mail), on a regular or periodic basis, to the contact details provided at the time of registration or contract conclusion.

Recipients or categories of recipients of personal data: the manager of KÜRT Academy Ltd., employees performing customer service and marketing tasks on the basis of their job function, employees of service providers operating the website of KÜRT Academy Ltd. as data processors.

The personal data processed include the name, address, telephone number and e-mail address of the natural person.

Duration of processing: until the data subject withdraws the processing of personal data for direct marketing purposes.

F.) TRANSFER OF DATA TO THE REGISTER OF ADULT EDUCATION KEPT BY THE STATE ADULT EDUCATION ADMINISTRATION

The KÜRT Academy Ltd. will transfer the data provided by you in relation to the training provided by the KÜRT Academy Ltd. and which are essential for the compulsory registration and data provision by the KÜRT Academy Ltd. in the adult education system to the adult education state administration body, in the so-called FAR system maintained by the latter.

The data subjects are all natural persons who participate in training courses organised by KÜRT Academy Ltd.

The purpose of the processing of personal data is to fulfil the legal obligation applicable to KÜRT Academy Ltd.

Legal basis for the processing: to fulfil a legal obligation imposed on the controller (Article 6(1)(c) of the Regulation).

Recipient of the personal data? The Metropolitan Government Office as the state administration body for adult education

Scope of the personal data processed: the data content required by the applicable legislation to be transmitted by the training provider.

7. OTHER RULES RELATING TO INTERNET USE

7.1. INFORMATION ABOUT VISITORS TO THE WEBSITE

Anyone can visit the website without providing any personal data. During visits to the / website, a small file called a "cookie" (hereinafter referred to collectively as "Cookie") is stored on the user's computer (or other Internet-enabled device such as a smart phone or tablet), through which the user's browser will be uniquely identified, provided that the user has given his/her explicit (active) consent to this by continuing to browse the website after being clearly and unambiguously informed. By accessing (browsing) the website, the data subject gives his or her consent to the processing and recording by KÜRT Academy Ltd.. of information that does not constitute personal data. Information of a technical nature, from which the person concerned cannot be identified, is not considered personal data and is therefore not subject to the Info Act. This information includes, in particular, the IP address, the time of the visit to the / website, the type of operating system of the computer, the address of another website that directed the data subject to the / website, etc. This information - which is not personal data - is processed in automated form for statistical and development purposes and for the purpose of Google and Facebook marketing and remarketing campaigns, for a maximum period of 60 days after the visit.

Cookies are essential for the proper functioning of the website and collect information about the use of the website in order to improve the user experience, i.e. to make the site more convenient and useful. Some Cookies are only stored temporarily (they are created until the browser is closed), while other Cookies remain on your computer for a longer period of time.

Data processed during a visit to the website: / When using the website, the following data is recorded and processed about the visitor and the device used for browsing: the IP address used by the visitor, the type of browser, the operating system characteristics of the device used for browsing (language set), the time of the visit, the (sub)page, function or service visited, clicks. The cookies used on this website do not store any personally identifiable information, and KÜRT Academy Ltd. does not process any personal data in this context.

By using the / website, the user gives his/her consent to the use of cookies by the website as described in this section 1. By default, most internet browsers are set to allow the storage of cookies without any user intervention and/or indication. If the user does not agree to the use of Cookies, he/she should configure his/her browser accordingly. The user can change the default browser settings to block cookies or to request a warning about which cookies are used by the website visited. For more information or to change the settings, the user can consult the browser's help section.

7.2. DATA COLLECTION FROM EXTERNAL SERVICE PROVIDERS ON THE WEBSITE

The html code of the website www.kurtakademia.hu may contain links from and to external servers independent of KÜRT Academy Ltd. The external server helps to independently audit the website for traffic and other web analytics data. The web analytics service provider is not entitled to process personal data on behalf of KÜRT Academy Ltd.. Currently, the web analytics service is provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043) as part of its Google Analytics service. Info: www.google.com.

Online credit card payments are made through Barion's system. Credit card information is not passed to the merchant. The service provider Barion Payment Zrt. is an institution supervised by the National Bank of Hungary, licence number H-EN-I-1064/2013.

8. DATA SECURITY MEASURES

8.1 KÜRT Academy Ltd. may process personal data only in connection with the activities set out in this Policy and only for the purposes for which the data is processed.

8.2.

8.3 KÜRT Academy Ltd. shall take appropriate measures to protect data against accidental or unlawful destruction, loss, alteration, transmission, damage, unauthorised disclosure or access, and against inaccessibility due to changes in the technology used. The technical and organisational measures to be implemented by KÜRT Academy Ltd:

◦ pseudonymisation and encryption of personal data;

◦ ensuring the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data;

◦ in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner;

◦ the use of a procedure to test, assess and evaluate regularly the effectiveness of the technical and organisational measures taken to ensure the security of data processing.

8.4. KÜRT Academy Ltd. shall ensure that personal data processed by it may only be accessed by employees or persons acting on behalf of KÜRT Academy Ltd. who have a genuine need to know them in order to perform their duties.

8.5. KÜRT Academy Ltd. stores personal data provided in the course of each data management activity separately from other data, with the understanding that, in accordance with the above provision, only employees with the appropriate access rights may have access to the separate data files.

8.6 KÜRT Academy Ltd. classifies personal data as confidential and treats them as such. Employees who handle personal data in the course of their duties are bound by confidentiality obligations regarding the handling of personal data. Access to personal data is restricted by KÜRT Academy Ltd. by granting levels of authorisation.

8.7 KÜRT Academy Ltd. shall take the following necessary measures to ensure the security of its IT records:

◦ It shall provide the data files it manages with permanent protection against computer viruses (real-time virus protection software).

◦ Ensure the physical protection of the hardware assets of the IT system, including protection against elementary damage,

◦ Ensure the protection of the IT system against unauthorised access, both software and hardware,

◦ Take all measures necessary for the recovery of data files, perform regular back-ups and implement separate and secure management of back-ups.

8.8 KÜRT Academy Ltd. shall take the necessary measures to protect the paper records, in particular with regard to physical security and fire protection. The management, employees and other persons acting on behalf of KÜRT Academy Ltd. shall keep secure and protect the data media containing personal data which they use or have in their possession, irrespective of the way in which the data are recorded, against unauthorised access, alteration, disclosure, disclosure, deletion or destruction, as well as against accidental destruction or damage.

8.9 KÜRT Academy Ltd. shall ensure that when processing personal data by automated means:

◦ the prevention of unauthorised data input;

◦ the prevention of the use of automated data processing systems by unauthorised persons using data transmission equipment;

◦ the verifiability and ascertainability of the bodies to which personal data have been or may be transmitted by means of a data transmission installation;

◦ the verifiability and ascertainability of which personal data have been introduced into automated data-processing systems, when and by whom;

◦ the recoverability of the installed systems in the event of a failure and

◦ that errors in automated processing are reported.

8.10. KÜRT Academy Ltd. shall ensure the control of incoming and outgoing electronic communications in order to protect personal data.

8.11. KÜRT Academy Ltd. does not allow the sharing of personal data processed by KÜRT Academy Ltd. on the Internet, as well as the visiting of sites offering file downloading, gaming, chat, sexual services. The use of unauthorised programs obtained from external sources or downloaded from external sources is also prohibited.

8.12. Only authorised employees have access to documents in the course of ongoing work or processing, and KÜRT Academy Ltd. ensures that documents containing personnel, payroll, employment and other personal data are kept securely locked. KÜRT Academy Ltd. shall ensure adequate physical protection of the data, the media on which they are stored, the hardware of the IT system and the documents.

9. HANDLING DATA BREACHES

9.1 A data breach is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed; (Article 4(12) of the Regulation)

9.2 A data protection incident is the loss of a device (laptop, mobile phone) containing personal data, unsecure storage of personal data (e.g. employment papers thrown in the trash); unsecure transmission of data, unauthorised copying, transmission, disclosure of customer and customer partner lists, attack on the IT system, e-mail containing personal data sent in error.

9.3. Handling and remediation of data protection incidents

9.3.1.

9.3.2 In case of detection of a data protection incident, the KÜRT Academy Ltd. In this context, KÜRT Academy Ltd. shall investigate and determine:

◦ the time and place of the occurrence of the incident,

◦ the description, circumstances and effects of the incident,

◦ the scope and the number of data compromised during the incident,

◦ the number of persons affected by the compromised data,

◦ a description of the measures taken to remedy the incident,

◦ a description of the measures taken to prevent, remediate and mitigate the damage.

9.3.2 In the event of a data breach, KÜRT Academy Ltd. shall contain and isolate the systems, persons and data concerned and shall ensure the collection and preservation of evidence supporting the occurrence of the breach. KÜRT Academy Ltd. will then begin to repair the damage and restore lawful operations.

9.3.3. KÜRT Academy Ltd. shall notify the data protection incident to the competent supervisory authority without undue delay and, if possible, no later than 72 hours after the data protection incident has come to its attention, unless the data protection incident is unlikely to pose a risk to the rights and freedoms of natural persons.

9.4. Recording of data breaches

9.4.1:

◦ the scope of the personal data concerned,

◦ the scope and number of persons affected by the personal data breach,

◦ the date of the personal data breach,

◦ the circumstances and effects of the personal data breach,

◦ the measures taken to remedy the personal data breach,

◦ other data specified in the legislation requiring the processing.

9.4.2. shall keep the records of the data protection records concerning the data protection records of the Data Protection Academy shall be kept for 5 years.

10. CHANGE THE CONTENT OF THE WEBSITE AND THE PRIVACY NOTICE

KÜRT Academy Ltd. expressly reserves the right to unilaterally change the content of its website and this Privacy Policy at any time without limitation or notice, and to terminate or suspend any service.

KÜRT Academy Ltd.