

Actionlab Kft. – Data Handling Protocol

Data Handling Protocol

1. The Purpose of this Data Handling Protocol

We built our company on professionalism and trust. This is the basis of our long-term relationship with our clients. Although Actionlab Kft. Is primarily working with legal entities, companies, through our training programs we handle data gathered from natural people. Our partners expect our data handling to be transparent, and to comply with all the current data handling laws. Making data management transparent, complying with existing legislation, and recognizing it as binding on us are natural and expected behaviors.

This Data Handling Protocol aims to serve the above goals.

Impacted by this protocol are our employees, training attendees, business partners, natural persons, and those persons that help the company in any fashion, or anyone else that comes in contact with our company, and that we store personal data from.

Actionlab Kft. retains all rights to modify this protocol based on any changes to current data handling laws.

2. The Data Handler

Name: Actionlab Kft.

Headquarters / Mailing Address: 1022 Budapest, Bimbo ut 39. II. Emelet 2

E-mail address: info@actionlab.hu

Company Registration Number; 01-09-947840

Tax ID: 22988245-2-42

Represented by: Kardos Marcell and Vitezy Peter managing directors

Name: Actionlab Consulting Europe s.r.o.

Headquartrs: Namestie Kossutha 3087/124 Komarno 945 01

Mailing Address: 1022 Budapest, Bimbo ut 39. II. Emelet 2.

E-mail address: info@actionlab.hu

Company Registration Number; 01-09-947840

Tax ID: 22988245-2-42

Represented by: Kardos Marcell and Vitezy Peter managing directors

- hereinafter referred to as “Enterprise”

3. Data Protection Officer Contact Details

There are no activities performed that require a Data Protection Officer to be employed.

4. Data Handling Goal, Legal Basis

Personal data handling is tied exclusively to specific goals. These can be: gather contact details, sending newsletters, feedback, training follow-up.

Personal details will not be used for anything other the stated purpose. Third parties will only receive data with the notification and permission of the person or entity in question – I. trainers legally working for us and the online training services for Future Learning Kft., a digital platform
– or as required by legal entities – I. invoices given to our accountants.

The 2018 may 25 law (EU) 2016/679 enacted by the European Council and Parliament (here after known as GDPR) defined six legal bases for handling personal data.

- Consent (used in that case where the other five bases for data handling do not apply);
- Contractual Agreement;
- Fulfill Legal Obligations (1. Sending invoices to Accountants);
- Protection of the Vital Interests of the Concerned Person (1. Pregnant employees health risks);
- Exercising Public Interest or Public Authority (1. Registration of sickness benefits with the Health Authorities);
- Enforcing a Legitimate Interest (based on interest balancing test).

From the above-mentioned legal bases, and using our company profile, and excluding the Exercising the Public Interest or Public Authority basis, we handle all data based on the remaining bases, for example

- Sending newsletters/eDM, gathering contact information on our homepage, and registering for our programs, data handling is requires Consent for the entity providing the data:
- Training attendees at the training location, or our specifically developed page on our website were the attendees can give their

Consent for data handling. The goal of this Consent to send training materials to the attendees and, in the case of e-learning materials, access to additional materials related to the training;

- The above Consent can be given prior to training provided we sent the business partner the above link, so the prospective attendees can provide their Consent in the manner described above;
- If we send an e-mail, we ask that the signed Consent be sent back via e-mail; informing the data subjects about this Data Management Prospectus, with their consent being deemed to have been given by contact.
- In the case of acquaintances, the handling of acquired data will be handled by means of Oral Consent;
- if we conclude a contract with a natural person on the basis of a contact based on Consent, the legal basis of the data handling will be changed to a Contractual Agreement, this will be communicated to the natural person client during the contact and in this in this data handling document;
- We treat the personal data provided by our clients, in addition to prior informed, according to the current data protection laws. The data will only be used for data processing to ensure accuracy.
- we handle our employees data only in accordance with legal regulations, thereby fulfilling our legal obligation;
- The legal basis for data handling related to invoicing is the fulfillment of the legal obligation (Article 6 (1) (c) of the GDPR), CL. 2017 of the Tax Code. TV. Section 78 (3) (deadline for retention of documents) and CXXVII of 2007 on General Sales Tax. TV. Article 169 (e) (compulsory elements of the invoice).

We would like to draw the attention of our partners and clients that if they provide data on persons other than themselves, they are required to get the Consent of the affected persons.

4.1 Consent Based Data Scope, Method of Collection, Storage Time

4.1.1 Data Collection via the Website, or Registration for any other program

Forms on our Website or on other application forms on our other regular repetitive programs are designed to provide online and offline contact options. In the forms, we ask for a personal name, phone number, email address and birth date (eg, to distinguish between two identical clients). We will treat these data as a Consent until the Consent is withdrawn.

4.1.2 Newsletter/eDM

If you sign up for a newsletter / eDM, the person concerned will be regularly informed about the trainings and the professional novelties. You can subscribe to the newsletter / eDM by submitting the information provided on the Contact page or the application form for your business program by subscribing to our newsletters. In this case, the legal basis for data handling is the Consent that we will handle until the Consent is withdrawn.

4.1.3 Training Location, and Training Preparation Data Gathering

In order to achieve the goals set for the training and to fulfill our obligations to the fullest extent, we need to manage the personal data of the participants involved in the training - name, e-mail address, phone number, date of birth. We treat these primarily as a legal basis for performance of the contract as a data processor. At the same time, there are additional opportunities for follow-up and communication between the parties, which, if involved as a natural person require data management tasks beyond the performance of the contract will be performed on the separately developed data processing platform. The range of data processed: name, email address, phone number, date of birth (for distinction). The data will be processed until the consent is withdrawn. These data are stored in a separate table with the Dropbox cloud-based provider used by our company.

4.1.4 Personal Contact

Our business is characterized by personal and business meetings by our company staff and managers that are followed by business contacts. During these meetings, business cards, LinkedIn Checks and other information exchanges are carried out, the subject of which are partially business secrets and the management of each other's personal data (such as name, company name, position, telephone number, e-mail address), with the active involvement and Consent of both parties happens. Data will be processed until the Consent is withdrawn. This data is stored in a separate table for our Dropbox cloud-based service provider.

4.1.5 Social Media

The collection of data, the range of data processed: Facebook / Instagram community name, registered name, or public profile image of the user.

Stakeholders: all those who are interested in / follow Facebook / Instagram community pages of the data controller.

The purpose of data collection is to promote the company, to present the company, to express an opinion, to initiate contact. Data that can be interpreted from the point of view of data management is not retrieved from this page by the data controller, and any statistics are irrelevant for data management. Affected written contributions are voluntarily managed managed, the owner can delete them themselves, or - if not adequate - the data controller reserves the right to delete a post from the community site.

4.1.6 Cookies

4.1.6.1 The Role of Cookies

- collecting information about visitors and their assets;
- note the custom settings for visitors that may be used (e.g. when using online transactions, so you do not have to type them again;
- facilitate the use of the website;
- quality user experience.

For a tailor-made service, the user's computer has a small data packet (cookie) installed, that can be read later. If your browser returns to a previously saved cookie, the cookie operator can link the user's current visit with the past, but only for their own content. Cookies do not contain personal information and are not suitable for individual user authentication. Cookies often contain a unique identifier - a secret, randomly generated number line - that your device stores. Some cookies will disappear after the website is closed and some will be stored for a longer period of time by your visiting computer. If your visitor wants to prevent cookie activity or delete data files from past visits, go to the following pages to get directions:

Firefox
Internet Explorer
Chrome,
Edge.

Some browsers also allow you to delete browsing data automatically each time you close it. You can read about it here.

4.1.7 Revoking Consent

- Consent can be withdrawn at any time in the same simple way it was provided. I
- In the case of a newsletter Consent can be revoked by clicking the unsubscribe link at the end of the newsletter, or by clicking on the unsubscribe. Link on the sign up page and providing your email address.
- If you have an email, you can click the "Unsubscribe" button next to the address to cancel your Consent.
- We also delete the data manually, if you send this request to info@ationlab.hu email address. Legitimate data processing prior to the withdrawal of the consent is considered legitimate after deletion.
- The limitation of the time spent on storing the Consent is, on the one hand, the withdrawal or non-cancellation of Consent as set out above and, on the other hand, the annual review by the company. If the profile of our company, the training and the methods change, the personal data stored in this activity will be deleted immediately.
- Data is stored at the Dropbox cloud-based service provider. The data on the paper clip (eg business card) is also stored on a computer, and then the paper-based media is stored in a locked storage cabinet.

4.2 Contracts and Legal Obligations

4.2.1 Billing

- Keeping billing information for issuing invoices is our statutory obligation. Our business typically contracts with legal entities, whose data typically include personal information, such as contact name, phone number, email address, or the name of a legal representative. A contract requires the knowledge of this data. In these cases, the legal basis for data processing is a signed contract.
- Partially a contractual agreement and partly a legitimate interest is the legal basis for handling business partner data - name, address / headquarters, e-mail address, phone number. This data will be stored in a Dropbox cloud-based service until the conclusion of the contract between us.
- The billing name and address are stored for a statutory period. The information on the invoice is determined by law.

4.2.2 Data management during performance of contract

- We fulfill our contractual obligations when we handle personal data of participants involved in trainings (offline trainings / online training e-learning program) - name, e-mail address, phone number, date of birth (to distinguish a person with a similar name) in order to achieve the goals set in the trainings. The purpose of the data management is to send the training materials, - in the case of online trainings - the entry data and feedback,

which are essential for the fulfillment of the contracted commitments. The data is obtained from the contractual partners so that the partners are obliged to inform the data subjects about the data transfer. We treat the data as a data processor until the completion of each training session, as provide the data as a third-party provider to Future.Learning Ltd., also as a data processor - as stated in our data processing mandate.

4.3 Naming a Legitimate Interest

This Privacy Policy category includes all the contributing parties with whom the company works in a cooperative form. We will store your business partner information (name, e-mail address, phone number, home address) – while the business relationship or we receive a deletion request with our Dropbox cloud provider.

5. Security Measures

Our enterprise cares about the data processed in our activities as expediently as possible. Our purpose is to prevent unauthorized access to data in any way. We are working on the Dropbox cloud-based provider, whose GDPR compliance information can be read here: <https://www.dropbox.com/security/GDPR>. We protect our desktop computers, laptops with a password and a constantly updated virus protection program. We protect the phones owned by the company using password or fingerprint authentication. Our site uses SSL encryption. When developing appropriate security measures, we have taken into account the current state of science and technology, the nature, scope, circumstances, goals of data management and the risk of varying probability and severity of natural persons' rights and freedoms. The company manages the data with an administrator who stays informed about data protection tasks. In addition, our clients executives are entitled to know the content of the stored personal information.

6. Data Processing

Our enterprise uses data processors to fulfill certain tasks.

Online training platform services:

Future Learning Kft.

1118 Budapest, Somloi ut 47-A 1. Emelet 1.

(Access to online training participants data)

Hosting Service:
GEDEON Nyomdaipari Bt.
2600 Vac, Zrinyi Miklos u. 9
E-mail: info@gedeon.hu
(Access to the full content of the site.)

Accounting Service Provider:
Meyer & Levinson Kft.
1052 Budapest, Deak Ferenc ter 3
E-mail: info@meyerlevinson.com
(Access to issued invoices.)

Accounting Service Provider:
Kebex s.r.o
Novozamocka cesta 4237/2. 945 01 Komarno Szlovakia
E-mail: reni@kebex.sk
(Access to issued invoices.)

7. Affected Data Forwarded to Third Countries

Our company does not forward personal data to third countries.

8. Rights of the Affected Persons

8.1 Transparency and Access to Personal Data

In accordance with the law and our own business confession, we strive to make all information to those concerned accessible, transparent and comprehensible. Clients are entitled to request feedback on whether their personal data is being processed and, if so, have access to the following information about them:

- data management goals;
- the categories of personal data concerned;
- the addressees to whom or with which personal data will be communicated or communicated, including third country addressees and international organizations;
- the intended duration of storage of data where this is not possible, the criteria for determining that period;
- the right of the data subject to request the data controller to rectify, erase or limit the personal data concerning him or her and may object to the handling of such personal data;

- the right to lodge a complaint addressed to the competent supervisory authority;
- if the data was not collected from the data subject, all available information about their source; automated decision making - for example, the use of data for profiling.

The above information will be provided to the applicant free of charge within 30 days of receipt of the request.

8.2 Right to rectify and to cancel

Interested persons are entitled to request the correction or addition of personal data relating to them. If one of the following cases exists, we shall be obliged to delete the personal data of the applicants concerned without undue delay:

- personal data is no longer needed for the purpose from which they were collected or otherwise handled;
- concerned will withdraw the consent of the data controller and no other legal basis for data processing;
- concerned object to data handling and have no prior legitimate reason for data handling;
- we treated personal data unlawfully;
- the personal data should be deleted for the legal obligation provided for by the law applicable to the data controller in the Union or the Member States

No personal data should be deleted when used for the purpose of exercising the right of expression and information; or if data processing is necessary for the submission, or for the validation or protection of legal claims. If such a situation occurs, we will inform the person concerned of the above.

8.3 Right to Restrict Data Management

Affected persons have the right to request a restriction on data handling if:

- debating the accuracy of personal data and clarifying inaccuracies
- data processing is illegal and does not require deletion of data to restrict their use;
- we no longer need personal data for data management but the person concerned requires them to submit, enforce, or protect legal claims;
- concerned have objected to the legitimate interest in data handling; in this case, the restriction applies to the duration of determining whether the data controller's legitimate reasons prevail over the legitimate grounds of the party concerned.

If data management is restricted, personal data may be handled only with the consent of the data subject or with the submission, validation or protection of legal claims or the protection of the rights of a natural or legal person, or in the public

interest of the Union or of a Member State. We will inform you about the release of the restriction in advance.

8.4 Right to Data Storage

If the legal basis of the data processing is a Consent or a Contractual Agreement and the data is processed in an automated manner, the data subjects are entitled to receive their personal information provided to them in a fragmented, widely used machine-readable format or forward this data to another data controller where technically feasible. The right to data storage should not adversely affect the rights and freedoms of others.

8.5 The Right to Protest

You have the right to protest at any time against the handling of your personal information, including profiling based on these provisions. In the event of a protest, the data controller may not process the personal data unless it proves that the data processing is justified by legitimate reasons of enforceability which have priority over the interests, rights and freedoms of the data concerned or which relate to the submission, enforcement or protection of legal claims.

8.6 Automated Decision Making in Individual Cases,including Profiling

Our company doesn't do profiling, so enforcing this law for our business can not be utilized.

9. In the Case of a Complaint

We treat your personal information with the utmost care. If you have any complaints or questions that arise despite the above, please feel free to contact us at info@actionlab.hu, we will try to remedy your problem ourselves. Naturally, the persons concerned have the right to seek out the courts to enforce their claims. Disputes relating to breaches of data management principles and procedures fall within the remit of the court and, in the case of jurisdiction, the litigation may be initiated by the court of the place of residence of the person concerned. Before or during the initiation of litigation before the processing of the data, we are open to an intermediary procedure at any time. In addition, any personal data complaint or question can be addressed to the National Privacy and Data Protection Authority (1125 Budapest, Erzsébet Szilágyi fasor 22 / C., Mail address: 1530 Budapest, Pf .: 5, email: ugyfelszolgalat@naih.hu, website: <http://www.naih.hu>).

10. Automated Decision Making

Our company does not use automated decision-making.

11. List of Relevant Regulations

- 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 Regulation (EC) No 95/46 (General Data Protection Regulation);
- 2011 CXII. law on information self-determination and freedom of information;
- Act XLVIII of 2008 on the Fundamental Terms and Limitations of Economic Advertising Activity law;
- 2001 CVIII. law on certain issues of electronic commerce services and information society services;
- Act V of 2013 on the Civil Code;
- LXXVI. copyright law; 45/2014. (II.26.) On the detailed rules of contracts between the consumer and the contractor
- Act CL. 2017 on the Order of Taxation law;
- The CXXVII of 2007 on General Sales Tax law