

## **DATA MANAGEMENT INFORMATION**

### **I. Purpose of the privacy notice**

Our business is built on trust and professionalism. This is the basis for long-term cooperation with our clients and business partners. Data controllers, although they mainly do business with legal entities and companies, also process data of natural persons in the course of their activities. Transparency of data processing, compliance with applicable laws and the recognition of our obligations to comply with them is a natural and expected behaviour.

This Privacy Notice is intended to serve the above purposes.

By "data subjects" we mean our employees, participants in our training courses, our business partners as natural persons, or those who otherwise assist the business, i.e. anyone about whom we hold personal data in connection with our business in any way.

The data controllers reserve the right to amend the information in accordance with the law.

### **II. The data controller**

Name: actionlab Ltd.

Headquarters / mailing address: 1022 Budapest, Bimbó út 39. II. floor

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

Company registration number: 01-09-947840

Tax number: 22988245-2-42

Represented by Marcell Kardos and Péter Vitézy, Managing Directors

Neve: Actionlab Consulting Europe s.r.o.

Registered office: Námestie Kossutha 3087/124 Komárno

945 01 Address of correspondence: 1022 Budapest, Bimbó

út 39, Budapest, Hungary, 2nd floor 2 E-mail address:

[info@actionlab.hu](mailto:info@actionlab.hu)

Company registration number: 36 765 554

VAT number: SK 2022373012

Represented by Marcell Kardos and Péter Vitézy, Managing Directors

**- hereinafter referred to as: undertaking**

### **III. Contact details of the Data Protection Officer**

We do not carry out any activities that would justify the appointment of a Data Protection Officer.

### **IV. Purposes and legal grounds for processing**

The processing of personal data is strictly limited to the purpose for which it is collected. Such purposes include: providing contact details, sending newsletters, providing feedback, following up on training sessions and using an app to support the effectiveness of training sessions.

Personal data will not be used for purposes other than those for which they were originally collected and will only be disclosed to third parties with the consent of the data subject or with his or her information - see for example to a trainer in a contractual relationship with us or to Future Learning Kft., the provider of the digital platform for online training services, or in the case of compliance with a legal obligation - see for example the transfer of invoices to an accountant.

As of 25 May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council of 25 May 2018 (hereinafter: GDPR) provides six legal bases for the processing of personal data:

- **consent** (may be requested if the other five legal bases do not apply to the processing);
- **conclusion of a contract**;
- **fulfil a legal obligation** (see sending invoices to the accountant);
- **protect the vital interests of the data subject**;
- **in the public interest or in the exercise of public authority** (see the registration of occupational accident sick pay as a social security payer);
- **pursuing a legitimate interest** (on the basis of a balancing test).

Of the above legal bases, given the profile of our business, we process data on the basis of legal bases other than the public interest or the exercise of official authority, i.e.

- sending newsletters/eDMs, contacting us on the website, registering for our programmes are possible on the basis of **consent to** data processing;
- training participants at the training venue, or via the dedicated training tool on our website

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to give their **consent to** the processing of their personal data for the purpose of sending them further material related to the training or, in the case of e-learning material, to access further material related to the training;

- the above **consent** can also be given before the training by sending our business partner a link to the above page in advance, where prospective participants can give their consent in the above way;
- in the case of an e-mail inquiry, we will inform the data subject of this Privacy Notice in the reply e-mail, stating that their consent is deemed to be given by contacting us;
- we process data obtained by the company on the basis of personal knowledge and on the basis of **verbal consent**;
- where we enter into a contract with a natural person on the basis of contact based on consent, the legal basis for processing is changed from consent **to** contract, and we inform the natural person concerned of this during the contact and in this Privacy Notice;
- We process the personal data of data subjects that our partners provide to us, with the information of the data subjects, on a contractual legal basis. We use this data in our capacity as a data processor;
- we only process our employees' data in accordance with the law, **fulfilling our legal obligations**;
- The legal basis for invoicing-related data processing is the fulfilment of **legal obligations** (Article 6 (1) (c) of the GDPR), Section 78 (3) of Act CL of 2017 on the Rules of Taxation (retention period for supporting documents) and Section 169 (e) of Act CXXVII of 2007 on Value Added Tax (mandatory elements of invoices).

Here again, we would like to remind our partners and customers that if they do not provide their own personal data, it is the responsibility of the data provider to obtain the consent of the data subject.

## **IV.1. Scope of data processed on the basis of consent, how it is collected, storage period**

### **IV.1.1. Data collection through the Contact Us page of the website and other application pages for other programmes of the company**

The Contact Us page on our website and other forms on the company's application pages are designed to provide online and offline contact opportunities. The forms ask for name, telephone number and e-mail address and date of birth (e.g. to distinguish between two customers with the same name) as personal data. We process this data on the basis of **consent** until consent is withdrawn.

### **IV.1.2. Newsletter/eDM**

If you subscribe to the newsletter/eDM, you will receive regular information about training courses and professional news. You can subscribe to the newsletter/eDM on the Contact page or on the registration forms for the company's programme by providing the above information, provided that you tick the box, i.e. you agree to receive our newsletter. The legal basis for the processing of the data is also in this case consent, which will be processed until **consent is** withdrawn.

### **IV.1.3. Data collection at the training location or in preparation for the training**

In order to achieve the objectives of the training courses and to fully comply with our obligations, we need to process the personal data of the participants of the training courses - name, e-mail address, telephone number, date of birth. These are processed primarily on a contractual basis, as a data processor. There are, however, additional possibilities for follow-up or contact between the parties which, if the data subject gives **his/her consent** as a natural person via a specially developed interface, require data processing tasks beyond the performance of the contract. The data processed are: name, e-mail address, telephone number, date of birth (for differentiation purposes). The data will be processed until consent is withdrawn. This data is stored in a separate spreadsheet on the Dropbox cloud service provider used by our company.

#### **IV.1.4. Personal contact**

Our company is characterised by the fact that our employees' personal and business meetings are followed by business contacts. During these encounters, business cards, LinkedIn tickers and other information are exchanged, some of which constitutes business secrets, and during which each other's data (such as name, company name, position, telephone number, e-mail address) is handled with the active cooperation and **consent of** both parties. The data will be processed until consent is withdrawn.

This data is stored in a separate spreadsheet on the Dropbox cloud service provider used by our company.

#### **VI.1.5. Community sites**

The fact of data collection, the scope of data processed: the name registered on Facebook / Instagram social networking sites and the user's public profile picture.

Data subjects: all data subjects who have liked/retweeted the Facebook/Instagram social media pages of the data controller.

The purpose of the data collection is to promote the business, to present the business, to express opinions and to initiate contacts. The data controller does not extract any data from this site that can be interpreted for data management purposes, and any statistics are not relevant for data management purposes. By "liking" or writing entries, data subjects voluntarily consent to the processing of data, they can delete them themselves, and - in case of inadequate content - the data controller reserves the right to delete entries from the social networking site.

#### **IV.1.6. Cookies ("cookies")**

##### **IV.1.6.1. What cookies do:**

- collect information about visitors and their devices;
- remember visitors' individual preferences, which are used, for example, when making online transactions, so they do not need to be re-entered;
- make the website easier to use;
- provide a quality user experience.

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In order to provide a personalised service, a small piece of data called a cookie is placed on the user's computer and read back during a subsequent visit. If the browser returns a previously saved cookie, the cookie provider has the possibility to link the user's current visit to previous visits, but only for its own content. Cookies do not contain any personal information and are not used to identify an individual user. Cookies often contain a unique identifier - a secret, randomly generated sequence of numbers - that is stored on your device. Some cookies are deleted after the website is closed, some are stored on the visitor's computer for a longer period of time.

To the extent that the visitor wishes to prevent cookie-related activities or to delete data files placed during previous visits, instructions are provided on the following pages:

[Firefox for Internet](#)

[Explorer](#)

[In](#)

[Chrome,](#)

[Edge.](#)

Some browsers also allow you to have your browsing data automatically deleted each time you close them. [You can read about this here.](#)

### **IV. 1.7. Withdrawal of consent**

Consent can be withdrawn at any time, in the same simple way as it was given.

In the case of a newsletter, consent can be withdrawn by clicking on the unsubscribe link at the end of the newsletter or by clicking on the "Unsubscribe from newsletter" tab on the subscription page and entering your e-mail address

We will also delete the data manually if we receive a request to do so at [info@actionlab.hu](mailto:info@actionlab.hu).

Lawful processing prior to the withdrawal of consent shall continue to be lawful after the withdrawal.

The time limit for storage on the basis of the legal basis for consent is limited on the one hand by the list of consents above

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or unsubscribe, and an annual database review by the company. If the profile of our company or the training courses and methods change, the personal data stored in this area of activity will be deleted immediately.

The data is stored with the cloud service provider Dropbox. The data received on paper (see business card) is also recorded on a computer, and the paper medium is stored in a locked cabinet.

### **IV.2. Contract and legal obligation**

#### **IV.2.1. Billing**

We are legally obliged to keep billing records and issue invoices. Our company typically enters into contracts with legal entities, which contain personal data, such as the name of the contact person, telephone number, e-mail address, or the name of the legal entity's representative. Knowledge of this information is a condition for entering into a contract. In these cases, the legal basis for processing is the conclusion of a contract.

The legal basis for the processing of business partners' data - name, address/place of business, e-mail address, telephone number - is partly for the conclusion of a contract and partly for legitimate interest. This data is stored by Dropbox cloud service provider for the duration of the contract between us.

Billing name and address are stored for the period required by law. The information on the invoice is determined by law.

#### **IV.2.2. Processing in the performance of contractual obligations**

We fulfil our contractual obligations when, in order to achieve the objectives of the training courses, we process personal data of the data subjects participating in the training courses (offline training/online training e-learning programme) - name, e-mail address, telephone number, date of birth (to distinguish between data subjects with similar names). The purpose of the processing is to send training materials, and in the case of online training, login data and feedback, which are essential for the performance of the contractually agreed obligations. The data are received from the contractual partners, on the understanding that the partners are obliged to inform the data subjects of the transfer. We process the data as a data processor until the full completion of each training course, as a third party to Future.Learning Kft, at the level of

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as a data processor - in accordance with the data processing mandate between us.

### **IV.3. Designation of legitimate interest**

This category of data processing under this legal basis includes all parties with whom the company has some form of cooperation.

Business partners' data (name, email address, phone number, headquarters, address) - stored with Dropbox cloud service provider until the business relationship is established or until a request for deletion is made.

## **V. Security measures**

We take the utmost care with the data we process in the course of our activities. We aim to ensure that data cannot be accessed in any unauthorised way.

We use the cloud-based service Dropbox, which is GDPR-compliant and can be found here: <https://www.dropbox.com/security/GDPR> Our desktop computers and laptops are password-protected and have a constantly updated antivirus program. Our company-owned phones are password protected and can be used after fingerprint identification. We use SSL encryption on our website.

In designing appropriate security measures, we have taken into account the state of the art, the nature, scope, context and purposes of the processing, and the varying likelihood and severity of the risk to the rights and freedoms of natural persons.

The data is handled by an administrative employee in the company, who is kept informed of what data protection is needed. In addition, the managers of the company are entitled to access the personal data stored.

## **VI. Data processors**

Our company uses data processors to perform certain tasks.

**Online training platform service by**

**Future Learning Kft.**



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1118 Budapest, Somlói út 47-A 1st floor 1.

(Access to the data of participants in online training.)

### **Shared space service:**

GEDEON Printing Company Ltd.

2600 Vác, Zrínyi Miklós u. 9.

[info@gedeon.hu](mailto:info@gedeon.hu)

(Access the full content of the website.)

### **Actionlab Ltd:**

#### **Accounting service provider:**

Meyer & Levinson Ltd.

1052 Budapest, Deák Ferenc tér 3.

E-mail: [info@meyerlevinson.com](mailto:info@meyerlevinson.com)

(Access to issued invoices.)

#### **Actionlab Consulting Europe**

**s.r.o:**

#### **Accounting service provider:**

Kebex s.r.o

Novozámocká cesta 4237/2, 945 01 Komárno, Slovakia

E-mail: [reni@kebex.sk](mailto:reni@kebex.sk)

(Access to issued invoices.)

## **VII. Transfer of data subjects' data to a third country**

Our company does not transfer personal data to third countries.

## **VIII. Rights of data subjects**

### **VIII.1. Transparency and data subjects' access to personal data**

In line with the law and our own business beliefs, we strive to make all information available to our stakeholders transparent and understandable.

Data subjects have the right to request feedback on the processing of their personal data

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are in the process of doing so, and if so, are entitled to access the following information we hold about them:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients to whom or with whom the personal data have been or will be disclosed, including recipients in third countries and international organisations;
- the envisaged duration of the storage of the data, and if this is not possible, the criteria for determining this duration;
- the right of the data subject to obtain from the controller 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;
- specifying the right to lodge a complaint with the competent supervisory authority;
- where I have not collected the data from the data subject, any available information about their source;
- automated decision-making the fact - for example your data for profiling the use of your data for profiling.

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

### **VIII.2. Right to rectification and erasure**

Data subjects have the right to request the rectification or integration of personal data concerning them.

If one of the following applies, we are obliged to delete the personal data of the applicants concerned without undue delay:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
  - data subjects withdraw their consent to processing and there is no other legal basis for the processing;
  - data subjects object to the processing and there are no overriding legitimate grounds for the processing;

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- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;

Personal data do not need to be erased if they are used for the purpose of exercising the right to express opinions and to receive information; or if the processing is necessary for the establishment, exercise or defence of legal claims. In such a situation, the data subject will be informed of the above.

### **VIII.3. Right to restriction of processing**

Data subjects have the right to request restriction of processing where:

- dispute the accuracy of personal data, until the inaccuracy is clarified
- the processing is unlawful and they request restriction of use instead of erasure;
- we no longer need the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
- data subjects have objected to processing for legitimate interests; in this case, the restriction applies for the period until it is established whether the controller's legitimate grounds prevail over the data subject's legitimate grounds.

Where processing is restricted, personal data, other than storage, may be processed only with the consent of the data subjects or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

Data subjects will be informed in advance of the lifting of the restriction.

### **VIII.4. Right to data retention**

Where the legal basis for processing is consent or contract, and the processing is automated, data subjects have the right to obtain the personal data we hold about them in a structured, commonly used, machine-readable format and to have that data transferred to another controller, where technically feasible.

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The right to data portability must not adversely affect the rights and freedoms of others.

### **VIII.5. Right to object**

Data subjects have the right to object at any time to the processing of their personal data, including profiling based on these provisions. In the event of an objection, the controller may no longer process the personal data unless it can demonstrate 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.

### **VIII.6. Automated decision-making on individual cases, including profiling**

Our company does not engage in profiling, so the exercise of this right is not meaningful for our company.

## **IX. In case of complaint**

We handle your personal data with the utmost care.

In the event of a complaint or query, please contact us at [info@actionlab.hu](mailto:info@actionlab.hu) and we will endeavour to resolve the problem in our own discretion.

Of course, data subjects have the right to take their claims to court. Disputes relating to breaches of data processing principles and procedures fall within the jurisdiction of the courts, which may be brought before the courts for the place of residence of the data subject.

I am open to mediation at any time before - or during - the initiation of legal proceedings concerning my processing.

In addition, the data subject may contact the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/C., postal address: 1530 Budapest, Pf.: 5., email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: <http://www.naih.hu>) with any complaints or questions regarding personal data.

## **X. Automated decision-making**

My company does not have automated decision-making.

## **XI. List of relevant legislation**

- 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/EC (General Data Protection Regulation);
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information;
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities;
- Act CVIII of 2001 on certain aspects of electronic commerce services and information society services;
- Act V of 2013 on the Civil Code;
- Act LXXVI of 1999 on Copyright;
- Government Decree 45/2014 (II.26.) on the detailed rules of contracts between consumers and entrepreneurs
- Act CL of 2017 on the Rules of Taxation;
- Act CXXVII of 2007 on Value Added Tax

## **XII. Third Party Processors**

### **Digital Marketing Service Providers**

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information.

Our appointed data processors include:

(i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here:<http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877. Their Data Protection Officer can be emailed at: [dpo@sopro.io](mailto:dpo@sopro.io).