



## DATA PROTECTION AND PRIVACY NOTICE

**TRAINING360 KFT.**

2 October 2020

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## TRAINING360 KFT. DATA PROTECTION AND PRIVACY NOTICE

All employees of Training360 are working to provide more to our clients in the fields of training, examination and recruitment. The processing of personal data is of paramount importance to us also due to the nature of our work.

We would like to assure you that your personal data is being processed safely and we comply with the provisions of *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 Directive 95/46/EC* (General Data Protection Regulation - GDPR). Below you will find information about our data processing activities, your rights under the GDPR and how you can exercise them.

### 1. Name and contact details of the data controller

Your personal data is processed by **Training360 Limited Liability Company** (hereinafter: “we,” “us,” or “Training360”) (seat: 1117 Budapest, Budafoki út 56. A ép. III em., tax ID number: 23150041-2-43, court of registration: Metropolitan Court of Registration, registration number: 01- 09-970992) as data controller.

We are not obliged to employ a Data Protection Officer, but in order to respond to any enquiries or questions regarding the processing of your personal data as soon as possible, we recommend that you contact us at the following email address:

[adatvedelem@training360.com](mailto:adatvedelem@training360.com)

### 2. Data processing activities conducted by Training360

In this document, you can read more information on the following data processing activities:

- training services (detailed version also available in English)
- testing delivery services (detailed version also available in English)
- e-learning services
- recruitment services
- data processing for job applicants
- data processing for business contacts
- sending newsletters
- use of the website and social media sites (detailed version also available in English)
- use of social media

## 2.1. Training Services

If you apply for and/or participate in a training course provided by Training360, your data will be processed in accordance with the provisions of Act LXXVII of 2013 on Adult Education and, in the case of licensed trainings, in accordance with the relevant law.

You can read detailed information on trainings related data processing, including the purpose, legal basis and duration of data processing, possible data transfer and use of data processors here:

<https://training360.com/download/training360-privacy-notice-training-services.pdf>

## 2.2. Testing Delivery Services

Training360 conducts exams for the authorized testing centers Pearson VUE, Certiport and PeopleCert. Please also read carefully the given provider's own privacy policy, as the service we provide is significantly determined by these policies as a precondition for the international recognition of the exams.

You can read Training360's examination related privacy policy, including the purpose, legal basis and duration of data processing, any possible data transfer and use of data processors here:

<https://training360.com/download/training360-privacy-notice-testing-services.pdf>

## 2.3. E-learning Services

Training360 sells access or subscriptions to e-learning material, either alone or in combination with training courses, to assist you in home preparation and learning in relation to our training courses. The e-learning framework system allows you to keep in touch with the trainer and other participants. Our electronic training materials will become accessible after registering on our website.

The detailed privacy notice on the use of the e-learning interface is available in Hungarian on the following website:

<https://training360.com/letoltes/training360-adatkezelesi-tajekoztato-e-learning.pdf>

## 2.4. Complex Training and Recruitment Services

Training360 assists those seeking a job in the IT industry both in their studies and in finding a job within the framework of its complex training and recruitment service (including, but not limited to, the IT Career Start Program). The complex program thus includes both training and the actual recruitment.

The detailed privacy notice of the program is available in Hungarian on the following website:

- <https://training360.com/letoltes/training360-adatkezelesi-tajekoztato-munkaero-kepzes-kozvetites-jelentkezok.pdf>
- <https://training360.com/letoltes/training360-adatkezelesi-tajekoztato-munkaero-kepzes-kozvetites-resztvevok.pdf>

## 2.5. Data Processing for Job Applicants

If you send us your CV or other document or message containing personal data either voluntarily or in response to a job advertisement, a multi-step selection process will be used to decide on your employment, which may include, depending on the job position, testing your foreign language knowledge, assessing your logical skills and measuring your personal competencies. If your application is successful, we will notify you separately of data processing during your employment before you sign your employment contract.

Detailed information on the purposes and the legal basis of the data processing, the scope of the data processed and the persons and entities involved is available in Hungarian on the following website:

<https://training360.com/letoltes/training360-adatkezelesi-tajekoztato-allashirdetesre-jelentkezok.pdf>

## 2.6. Data Processing for Business Contacts

When you contact us as the employee or contact person of one of our present or future partners, we will process your personal data pursuant to paragraph f) of Article 6 (1) of the GDPR based on the *legitimate interest of Training360 Kft.* and the partner company or organization to be able to communicate with each other during the course of their business. The *purpose* of data processing is to ensure communication between the two entities. The data will be processed until the end of our liaising function or, where it is specified in a contract or other document to be retained, we will store it for the mandatory retention period specified in such document (for 8 years in case of accounting documents).

## 2.7. Sending Newsletters

When you sign up for our newsletter, we will process your name and email address. The *legal basis* for data processing is your consent pursuant to paragraph a) of Article 6(1) of the GDPR. Please note that you may withdraw your consent at any time, but this does not affect the lawfulness of any processing prior to such withdrawal.

- The *purpose* of data processing is to inform you by sending our newsletter about novelties, special offers and news relating to our services.

- *Duration* of data processing: until the consent is withdrawn (unsubscription) or the service is terminated.
- When sending newsletters, we use the following *data processors* to whom your data will be forwarded:
  - We use Amazon's (Amazon Headquarters 410 Terry Ave. N Seattle, WA 98109) Sendy newsletter application based on SES (Simple Email Services) to send and manage newsletters.
  - When sending a newsletter, your personal data may also be transferred to a country outside the European Union (United States of America). See more detailed information here: <https://aws.amazon.com/compliance/data-privacy-faq/> In doing so, we apply the following safeguards: EU-US Privacy Shield.
  - Data processor contributing to the form and content of the newsletter and liaising with the newsletter service provider: Republic Group Kft., 1013 Budapest, Krisztina Körút 51., V. emelet 2.

You can easily unsubscribe from the newsletter at any time by clicking the "Unsubscribe" button or by modifying your account after logging in on the Training360 website.

## 2.8. Data processing relating to the use of the website and social media sites

When you use our websites, Training360 uses cookies to personalize and improve your user experience and deliver online advertising to you.

Single documents about cookie / web site and social media policy:

<https://training360.com/letoltes/training360-adatkezelesi-tajekoztato-cookie.pdf>

## 3. Data security measures

Training360 pays special attention to the secure management and storage of personal data. We protect our IT systems with firewalls, provide for regular security updates and update our protection tools against malicious codes. We are constantly making backups of your data. Any access to our systems and data is logged.

Paper records are kept locked and, during both electronic and paper-based data processing, we make sure that employees have access to your personal data on a strictly need-to-know basis. We raise our employees' privacy awareness through regular training and education.

We also require our contributors (data processors) to comply with the data security measures, and data is transmitted through secure channels. When selecting them, we pay particular attention to ensuring the security of your personal data when they process your personal data.

We operate a CCTV system in our head office (1117 Budapest, Budafoki út 56. A ép., III. emelet), which serves security purposes. Recordings are kept for 3 business days and the detailed notice on this is displayed at the office entrance.

## 4. Your rights as a data subject

### 4.1. Right of access

You may at any time ask for information about whether or not your personal data is being processed. If it is, you have the right to receive a copy of your personal data and to enquire about:

- the purpose of data processing;
- what types of personal data we collect about you;
- to whom your personal data has been (or is to be) disclosed;
- the period for which your personal data will be stored;
- your rights to rectification, erasure, restriction, objection, complaint;
- data sources, if the data was not collected from you.

### 4.2. Right to rectification

You have the right at any time to ask for the rectification of your personal data if it has been incorrectly recorded or is otherwise inaccurate or if it has changed. If your details (e.g. your email address, contact phone number) change, please let us know providing your old (incorrect) and new (correct) data so that we can identify you.

### 4.3. Right to erasure

The GDPR allows you to request the erasure of your personal data in certain cases, and it is also mandatory for the controller. Such cases include where:

- we do not need your personal data any longer in relation to the purposes for which they were collected or processed;
- the legal basis for processing is your consent and you have withdrawn such consent;
- the legal basis for the data processing is the legitimate interest of Training360 Kft. and you successfully object to such data processing;
- personal data has been processed unlawfully;
- personal data shall be erased due to a legal requirement;
- the data was collected for direct marketing purposes and you object to this.

If your personal data has been made public, and we are obliged to erase it (subject to the available technology and the costs of erasure), we will take steps to inform the other data controllers that you have requested the erasure of the link to your personal data or any copy or duplicate of your data.

The right to erasure is not enforceable if the data processing is required for exercising the right of freedom of expression and information, due to statutory obligations (e.g. Adult Education Act, Vocational Training Act, Financial and Accounting Act and related regulations), in the interest of the public concerning public health, archiving in the interest of the public, in connection with the processing of data for scientific and historical research or statistical purposes, or for the enforcement of legal claims.

#### 4.4. Right to restrict processing

Restricting data processing means that personal data must not be used for a certain period of time and must be stored separately until a decision is made on what to do with the data.

In the following cases, you may request that our company restrict data processing:

- while we are checking the accuracy of your personal data because you are disputing it;
- in case of unlawful data processing, if you request a restriction of use instead of erasure;
- we no longer need your personal data, but you need it to enforce your legal claim;
- while we review your objection request if you objected to the data processing.

You will be informed before the restriction of processing is lifted.

#### 4.5. Right to data portability

If processing is based on your consent or the legal basis for the processing is the performance of the contract with you (see the individual privacy notices), and electronic processing is done, you may request that the personal data concerned be transmitted to you electronically and forwarded to another controller. Where this is technically viable, you may request that the data be transmitted directly to the other controller.

#### 4.6. Right to object

You may object to the data processing if it is based on the legitimate interest of Training360 or a third party (see the individual privacy notices). If such legitimate interest is based on direct marketing, then in the event of an objection, we shall terminate the data processing.

If data processing is based on other legitimate interests and you object, Training360 will investigate whether or not the reasons and interests for which the data processing is needed take precedence over your interests and rights, or whether we need your personal data to enforce legal claims.

#### 4.7. The right to file a complaint

You can file a complaint against the processing of your data by our Company which may be submitted to the Hungarian National Authority for Data Protection and Freedom of



Information (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1374 Budapest, Pf. 603, telephone: +36-1-391-1400, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)).

You are also entitled to pursue your claim at court.

## 5. Enforcing your rights

Data requests and any inquiries regarding data processing may be submitted to us via the following addresses (in Hungarian or in English language):

Training360 Korlátolt Felelősségű Társaság  
Mailing address: 1117 Budapest, Budafoki út 56. A. ép. III. emelet  
Email: [adatvedelem@training360.com](mailto:adatvedelem@training360.com)

We will inform you primarily electronically or in writing sending the relevant information to the contact address you provide. On request, we also provide verbal information on the processing of personal data.

The protection of your personal data requires us to verify that the request really comes from you. Therefore, if we receive a data request on your behalf from an (electronic) address that you have not previously notified to us, we will need to request some form of verification of your identity.

Requests for the exercise of the data subject's rights will be answered as soon as possible but in any case within one month of receipt of the request informing you of the action taken (e.g. erasure, rectification), provided that the identity of the requester can be established. Depending on the complexity of the request or the number of requests, this time limit may be extended up to a maximum of 2 months, which, however, shall be notified within one month of receipt of the request, giving reasons for such extension.

If we are unable to comply with your request, we will also notify you, together with the reasons therefor, within one month of receipt of the request reminding you of your right to lodge a complaint and seek judicial remedy.

We provide information concerning data processing as well as the response to requests related to the exercise of the rights listed above free of charge. However, where the request is manifestly unfounded or excessive, in particular because of its repetitive character, we are entitled to charge a reasonable fee or refuse to act on the request.

Any rectification, erasure or restriction action taken in response to a request will be communicated to all recipients (third parties, such as data processors) to whom the personal data has been disclosed, unless this is impossible or involves a disproportionate effort. At your request, we will notify you of these third parties so that you no longer need to contact them directly to rectify or erase your personal data.

Requests from data subjects shall be recorded, stating the date of receipt, the subject of the request, the name of the requester, the response to the request and the date on which the requested action was taken. The purpose of the register is to ensure that Training360 has the necessary evidence in any future legal dispute and its legal basis is the legitimate interest of the data controller in the protection of its rights (paragraph f of Article 6(1) of the GDPR). Duration of data processing: 5 years from taking action or rejecting the request. If you have submitted a request in connection with your personal data that is (also) processed by Microsoft Corporation (e.g., your Microsoft ID, vendor exams), we will notify Microsoft of the completion of your request or will contact them in case of doubt on whether the request can be satisfied.

In the event of a data breach that is likely to pose a significant risk to the rights of data subjects, we will promptly inform them personally or by a public announcement on the incident.

## 6. Entry into force

This updated version of the Privacy Notice shall enter into force on 1 December 2019. The latest version of the privacy notices referenced in this document is available on our website at the links provided. This Notice may be amended at any time by the unilateral decision of the data controller and the amendment shall become effective upon publication.

## 7. Related public privacy notices

- [Data processing and cookie management notice for the use of the Training360 Kft. website and social media websites](#) (available in English)
- [Privacy notice for the training courses of Training360 Kft.](#) (available in English)
- [Privacy notice for the international testing delivery services of Training360 Kft.](#) (available in English)
- [Privacy notice for the e-learning services of Training360 Kft.](#)
- [Privacy notice for the complex training and workforce development programs of Training360 Kft. \(application phase\)](#)
- [Privacy notice for the complex training and workforce development programs of Training360 Kft. \(participation in the program\)](#)
- [Privacy notice for candidates responding to the recruitment notices of Training360 Kft.](#)