

PRIVACY NOTICE

for data processing of course participants
(Valid from 13 May 2020 until 31 August 2020)

Dear Participant,

Below, we would like to inform you about the processing of personal data related to the courses offered by the training centre of Training360 in accordance with the European Union's General Data Protection Regulation (GDPR).

1. Data Controller

Training360 Kft.
Address: 1117 Budapest, Budafoki út 56. A. épület 3. emelet
Tel.: +36-1-880-0040
Fax: +36-1-880-0041
E-mail: adatvedelem@training360.com
Web: www.training360.com

2. Data processing operations

Below, you will find information on the types of data processed, the purpose of data processing, the legal basis and the duration of data processing, and on any possible data transmission.

2.1 Course application

2.1.1 Type of data processed

When you apply for a course, we will manage your (as a training applicant's) name, job title, workplace name, phone number, email address, fax number and address (if you pay the bill) and the details of the course of your choice.

If your employer (or a third party) signs you up for the training course and uses any national or EU grant support to pay the fee, the employer will provide us with additional personal information (such as your place and date of birth, mother's name, nationality, highest education, SSN), of which data disclosure you will be informed in advance.

If the training course requires proof of your existing competencies, we will process the details of the qualification certificates you have provided as well as the copies of such certificates. If you also use our prior knowledge testing service, we will process your name, email address, date of birth and test results.

2.1.2 The purpose of data processing

In the case of licensed training, the **purpose of data processing** is to record data required for the conclusion of the contract or, in other cases, for identifying the participants delegated by the client,

and to collect and record the contact details in the internal administration system and to keep contact with the applicant.

In the case of corporate orders financed from tender funds, the purpose of the processing of additional data is to deliver the contract made with the customer and to ensure compliance with the tender specifications.

The purpose of recording data in the internal administration system is the internal recording of the data necessary for the organization of the training and for keeping contact with the trainee, and for the operation of the administration system.

The purpose of data processing in connection with the verification of prior competences and the prior knowledge measurement service is to verify and certify the existence of the competencies, to properly prepare the personalized training in case of individual and mentored training, establishing contact with the participant, and fulfilment of the obligation to retain documents specified in Section 16 of Act LXXVII of 2013 on Adult Education (hereinafter: Adult Education Act).

2.1.3 The Legal Basis of Data Processing

The **legal basis** of the processing of personal identification data in the case of licensed training is the disclosure of data necessary for the delivery of the adult training contract (Paragraph b) of Article 6(1) of the GDPR), and in case of contact details it is the legitimate interest of Training360 (Paragraph f) of Article 6(1) of the GDPR) to keep contact with the trainee. In the case of data originating from the client, the legal basis of data processing is the legitimate interest of the client and Training360 (Paragraph f) Article 6(1) of the GDPR) to deliver the contract made between them and to comply with the tender specifications in case of a tender. Data must be provided for concluding an adult training contract as it is required by the Adult Education Act, otherwise you will not be able to attend our licensed courses.

The legal basis for processing data in the internal administration system is the legitimate interest of Training360 (Paragraph f) Article 6(1) of the GDPR) to operate its own corporate management system.

The legal basis of prior competence assessment and prior knowledge measurement service is to ensure compliance with paragraph b) of Section 16 of the Adult Education Act (point c) of Article 6(1) of the GDPR), and in case of individual and mentored training it is the legitimate interest (point f) of Article 6(1) of the GDPR) of Training360 to provide you with the appropriate quality of service through tailor-made training.

2.1.4 Data retention period

Paper-based application forms and the data recorded in our electronic filing system will be retained until the expiry of the 8-year period for legal claims (Adult Education Act) or, in the case of training financed from tender funds, for the retention period specified in the tender specifications (typically for 10 years).

Copies of documents certifying prior competences and documents relating to prior knowledge assessment will be retained for 8 years pursuant to paragraph b) of Section 16 of the Adult Education Act.

2.1.5 Data transmission

The Adult Education Act obliges the adult education institutions to **disclose statistical data** and, accordingly, Training360 transmits data pursuant to Section 15 of the Adult Education Act as statistical data into the Adult Education Information System (FIR) on the training group as well as anonymous data into the National Statistical Data Collection Program (OSAP) as required in Section 21 of the Adult Education Act.

If the training is organized and implemented by another partner (a 3rd party), we will forward your application data to them and they will treat the data as an independent controller and provide you with their own privacy notice directly. In the case of individual and mentored training, if the training is provided by an external instructor, we will disclose your contact details and pre-qualification information to them. You will be informed of the instructor's identity in our confirmation.

2.2 Adult training contract

2.2.1 Type of data processed

If you take part in a **training course** under the Adult Education Act, an adult training contract will be entered into between you and Training360 under which we will process the personal data specified in Section 21 of the Adult Education Act.

2.2.2 The purpose of data processing

The **purpose of** processing the data in the adult training contract is to record the data required by Sections 13 and 21 of the Adult Education Act (necessary e.g. for identifying participants and for the fulfilment of the contract, etc.), to prepare and record the contract and to comply with the document retention obligation set forth in the Adult Education Act.

2.2.3 The Legal Basis of Data Processing

The **legal basis** of the processing of the data included in the contract is the fulfilment of a legal obligation (Sections 11(b), 13, 16, 21) of the Adult Education Act) (point c) of Article 6(1) of the GDPR];

2.2.4 Data retention period

Adult training contracts are **retained** for 8 years pursuant to paragraph c) of Section 16 of the Adult Education Act.

2.2.5 Data transmission

If the course is implemented with the involvement of an external instructor who acts as a data processor, **we will disclose** the adult training contract to them. The identity of the instructor will be disclosed to participants on the first day of the training.

2.3 Course documentation

2.3.1 Type of data processed

During the course, we will keep an attendance list and, in the case of licensed training, a progress log showing your name, signature and any possibly absence. For Live Virtual Class (LVC) training, the attendance list (sheet) can be replaced by a screenshot of the list of participants logged in to the training broadcast application, created by the instructor or the training coordinator.

If you require vendors' official *online training materials* (e.g. in case of Microsoft, Cisco, VMware, Oracle, IBM training), Training360 is entitled and obliged to provide or certify your name, address, vendor ID (if any), and the course material of your choice on the dedicated vendor interface, and, in the case of VMware, Oracle and IBM training, also your telephone number and workplace.

In the case of training financed from national or European Union funds, where required by the tender specifications, we must make an *image and/or sound recording* of the training course.

In the case of Live Virtual Class training (LVC), by logging in and attending the training, you agree that the participants of the training, the instructors of the training and the organizing staff of Training360 Kft. can hear your voice; if you allow it, they can see your camera image or your shared applications and screenshots. In the case of Live Virtual Class (LVC) training, audio and video recording is not made by default; only if it is required by the domestic or European Union tender conditions, or in the case of individual group training, on Customer requests, with employees and Training360 Kft. permission. In this case, the recording can be initiated by the Customer. In all other cases, Training360 Kft. informs the participants before the training.

Completion of the course will be certified by issuing a certificate of attendance, which contains your name, the name of the course you have completed, and a serial number. If the training ends with an examination, the result will be certified by a document which records your name, place and date of birth, the completed training and its result.

2.3.2 The purpose of data processing

In the case of the *attendance sheet and progress log kept during the training*, the **purpose of data processing is** to document attendance or absence and to fulfil the documentation and retention obligations prescribed by the Adult Education Act. In the case of a corporate order, the attendance sheet also serves as a certificate of performance (or the basis thereof) for the client.

When applying for *online training materials*, in case of official PeopleCert training materials, the purpose of data processing is to upload the database required by the vendor (or by IT Preneurs, Weena 242, 3012 NJ Rotterdam who provide the accredited training material) and to provide the training material for the trainee. In the case of training material and/or lab requests by other vendors, the purpose of data processing is to disclose the data required by the vendor to provide access to the online training material and/or the lab environment, and to certify completion of training for subsequent formal examination.

In the case of the *image and/or audio recording* made during the training, the purpose of data processing is to comply with the tender specifications and to certify the completion of the training.

In all other cases, Training360 Kft. informs the participants about the data management. In this case the purpose of the recording may be a quality assurance goal, to increase the user experience and the efficiency of the training (review, repetition).

At the end of the training, in issuing the certificate of attendance or, optionally, an examination certificate, the purpose of data processing is to document and certify that the participant has completed the training course and the results, and, in the case of training funded by national or EU grant sources, that it has complied with the tender specifications.

2.3.3 The Legal Basis of Data Processing

In the case of the *attendance sheets and progress logs of the training course*, the **legal basis** of data processing is the fulfilment of a legal obligation (paragraphs a) and c) of Section 16 of the Adult Education Act) (point c) of Article 6(1) of the GDPR). If the attendance sheet also serves as a certificate of performance to the client, then the legal basis is the client's and Training360's legitimate interest to certify the performance of the contract between them (point f) of Article 6(1) of the GDPR).

In the case of an official vendor *online training* course, the legal basis of data processing is the legitimate interest of Training360 and the training provider (point f) of Article 6(1) of the GDPR) to identify the participant, establish and certify their right to get the training material, and provide the training material for them.

In respect of the *audio and video recordings* made during the training, the legal basis of data processing is the legitimate interest of Training360 (point f) of Article 6(1) of the GDPR) to comply with the tender specifications and certify such compliance. In all other cases, Training360 Kft. informs the participants of the training about the data management and its legal basis separately.

With regard to personal data processed during the issuance of a *certificate of attendance*, the legal basis of data processing is the fulfilment of a legal obligation (paragraph d) of Section 16 of the Adult Education Act) (point c) of Article 6(1) of the GDPR], whereas in issuing the examination results and the certificate, the legal basis is the legitimate interest of Training360 and the employer (point f) of Article 6(1) of the GDPR) to comply with the tender specifications and certify such compliance.

2.3.4 Data retention period

Adult training contracts, attendance sheets and progress logs will be **retained** pursuant to paragraph a) and c) of Section 16 of the Adult Education Act while the attendance certificate and the examination certificate will be retained pursuant to paragraph d) of Section 16 of the Adult Education Act, for 8 years in each case.

The data of official vendor's *online training materials* is stored by the respective vendor / training material provider, i.e. Training360 does not record it.

Audio and video recordings made during the training: if the recording was made by Training360, it will be forwarded to the beneficiary client (customer), there is no retention on behalf of Training360.

2.3.5 Data transmission

If the course is implemented with the assistance of an external instructor who acts as a data processor, **we will disclose** the training documentation (attendance sheet, progress log, attendance/exam

certificate) to them. The identity of the instructor will be disclosed to participants on the first day of the training.

When applying for official vendor training courses online and registering in the vendor's training system, we will disclose your data to the training material provider and/or official vendor/operator (depending on vendor: name, email address, workplace, address, telephone number, country, language):

- For Official Microsoft Training: Arvato Systems Group, An der Autobahn 200, 33333 Gütersloh and Microsoft Corporation, One Microsoft Way, Redmond, Washington, U.S.
- For Official Cisco Training: Cisco Systems, Inc., Corporate Headquarters, 170 West Tasman Dr. San Jose, CA 95134 USA
- For Official IBM Training: Global Knowledge UK, Mulberry Business Park, Fishponds Road, Wokingham, Berkshire, RG41 2GY and IBM Corporation, Armonk, New York, U.S.
- For Official VMware Training: VMware, Inc., 3401 Hillview Ave., Palo Alto, CA 94304
- For Official Oracle Training: Oracle Corporation, 500 Oracle Parkway, Redwood Shores, CA 94065
- For Official PeopleCert Training: PeopleCert Inc., Themistokli Dervi 40, Street 1066, Ciprus illetve ITpreneurs, Weena 242, 3012 NJ Rotterdam

You can read more about each official vendor's privacy policy on the following pages:

- Microsoft: <https://privacy.microsoft.com/hu-hu/privacystatement>
- VMware: <https://www.vmware.com/hu/help/privacy.html>
- IBM: <https://www.ibm.com/privacy/hu/hu/>
- Oracle: <https://www.oracle.com/hu/legal/privacy/>
- PeopleCert: <https://www.peoplecert.org/terms-of-service-and-privacy-policy>
- IT Preneurs: <https://www.itpreneurs.com/privacy-policy/>

In the above cases data is transferred also outside the European Union, based on paragraphs (b) and (c) of Article 49(1) of the GDPR, because it is necessary for the delivery of the contract between the given vendor or provider of educational material (access to the material) or because it is necessary to fulfil the contract between Training360 as a data processor and the given vendor or provider so that the lawfulness of access to the training material can be verified. Click on the links above for more information about our measures taken to ensure the security of data transmission.

If the attendee is signed up the training by their employer (buyer), including when the training is financed from domestic or EU-fund tenders, we will disclose to the employer information on attendance at the course, the completion of the training and, where audio and video recordings must be made, we will also deliver them to the employer.

2.4 Invoicing

2.4.1 Type of data processed

If you pay the course fee, we will process your name, address and the amount of the course fee in the invoice. If the invoice is paid by your employer, we will use your name as a reference when we issue the invoice. If you have requested a meal, we will process your name and signature on the meal voucher receipt.

2.4.2 The purpose of data processing

The **purpose** of data processing is to issue and retain an invoice for payment of the course fee with such content as required in the relevant laws and, where the costs are paid by a third party, to identify the cost (also giving your name). In the case of meal vouchers, the purpose of data processing is to certify the delivery and acceptance of the ordered meal vouchers and to ensure settlement between Training360 and the meal service provider.

2.4.3 The Legal Basis of Data Processing

In the case of payment by the client, the **legal basis** of data processing is the legitimate interest of Training360 (Paragraph f) Article 6(1) of the GDPR) to receive the consideration for the training from the client or, where the training is paid for by the trainee, to issue an invoice with such content as required by the relevant laws.

2.4.4 Data retention period

The invoices will be **retained** in accordance with the relevant law (Section 169 of Act C of 2000) for 8 years, while meal voucher receipts will be retained until the expiry of the 5-year period for legal claims.

2.4.5 Data transmission

The invoices are managed by Training360 with the involvement of the following **data processor**:

Firm name: BPiON Services Kft. (valid from effective 1st June, 2020)
Registered seat: székhely: 1139 Budapest, Váci út 99, 2. em.

3. Storage of data, additional data transmission

Training360 as a data controller stores your data described in the section 2 in a secure on-premise datacenter ((1117 Budapest, Budafoki út 56.) and on Microsoft online cloud-based systems (Microsoft Office 365, Azure, Dynamics CRM 365). Training360 handles and manages confidential and strictly confidential data with the proper rights and access management policies; handles paper-based versions (documents) securely, and stores them in a lockable place (archive, lockable offices and lockers).

Data transfer: the data related to the data management specified in point 2 will be stored and saved partly using the cloud services operated by Microsoft. Due to the nature of the service, your personal data may be transferred outside the European Union. This transfer is based on Article 49 (1) (c) GDPR, the fulfilment of a contract between Training360 and Microsoft to provide the service to you. The security measures that Microsoft applies are available here:

- <https://privacy.microsoft.com/en-us/privacystatement>
- <https://docs.microsoft.com/en-us/dynamics365/get-started/gdpr/>
- <https://azure.microsoft.com/en-us/support/legal/sla/>
- <https://www.microsoftvolumelicensing.com/Downloader.aspx?DocumentId=17454>

4. Your rights relating to data processing

As a data subject, you have the right to access, rectify, delete and object to the processing of your data or in certain cases you may exercise the right to data portability, or request a restriction on the processing of your personal data (until a decision is made on what to do with your data). The data controller shall reply to the data subject's request within one month.

Complaints may be filed at the following contact details, in English or in Hungarian language:

Training360 Kft.

Address: 1117 Budapest, Budafoki út 56. A. épület 3. emelet

Tel.: +36-1-880-0040

Fax: +36-1-880-0041

Email: adatvedelem@training360.com

Web: www.training360.com

If we process your personal information that can be linked to Microsoft Corporation (eg. vendor ID, previous exams, exam history, training) and apply to Training360 Kft. in connection with this, we will record these requests to demonstrate the proper handling of personal information related to Microsoft. Its legal basis is Microsoft's legitimate interest in verifying the security of the processing of personal data at its partners and, in the case of Training360 Kft., in complying with the partnership agreement. The duration of the data processing is 8 years, and the data in the registry can be inspected by Microsoft during the audit, and the processing of applications must be informed.

You can file your complaints relating to data processing with the competent authority (National Authority for Data Protection and Freedom of Information – www.naih.hu address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C, phone: +36-1-391-1400, E-mail address: ugyfelszolgalat@naih.hu), or you may pursue your claim through a court of jurisdiction.

The Hungarian version of this Privacy Notice of Training360 Kft. is accessible in the footer of the Training360 website (Privacy notice / Adatvédelmi és adatkezelési tájékoztató).