

PRIVACY NOTICE

for training participants

Valid from 2 October 2020 until 14 January 2021

Dear Participant,

Below, we would like to inform you about the processing of personal data related to the training courses offered by the training centre of Training360 Kft. 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.

- a) Data processing may differ for *notifiable* and *licensed training courses*.
- b) Licensed training courses are training courses that are audited and licensed by a government organisation / authority / adult training institution. *Licensed courses have a* unique registration / licence number. Licensed training courses are typically provided by Training360 Kft. in the case of training courses financed from government or European Union subsidies. In the case of participation in licensed training courses, the data provided in the adult training contract must be retained and stored by Training360 Kft. in accordance with Act LXXVII of 2013 on adult education (hereinafter: Adult Education Act). Some of your personal data is transferred to the competent authorities (adult education authorities) and recorded and stored in the Adult Education Data Reporting System (FAR).
- c) *Notifiable training courses* are training courses announced by Training360 Kft., to which the Adult Education Act also applies, but with different administrative and reporting obligations (most of our training courses are of this kind). In the case of notifiable training courses, you may object to the recording of certain personal data in the adult training reporting system or the transmission of such data to the authorities.
- d) In addition, there are knowledge sharing / development solutions that are not governed by the provisions of the Adult Education Act (e.g. workshop, coaching, counseling, event, e-learning subscriptions, online content, etc.). In this case, the data processing procedures relevant to notifiable training courses or to the specific service (e.g. e-learning services) apply.

2.1 Training course application

2.1.1 Type of data processed

- a) When you apply for a training course, we will process your (as a training applicant's) name, job title, workplace name, phone number, e-mail address, fax number, address (if you pay the bill), education ID and the details of the training course of your choice. If you do not know your education ID, Training360 Kft. can retrieve or request it with the help of the Adult Education Data Reporting System (FAR) based on your natural personal identification data (see point 2.1.3).
- b) If your employer (or a third party) signs you up for the training course and/or uses any national or EU grant support to pay the fee, the employer will need to retrieve/provide us with additional personal information (such as your place and date of birth, mother's name, nationality, sex, home address, highest education, social security number, tax identification number), of which data disclosure you will be informed in advance. This information is also required for concluding an adult training contract.
- c) 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, e-mail address, date of birth and test results.

2.1.2 The purpose of data processing

The purpose of data processing

- a) *In the case of licensed training courses:* preparation of the adult training contract pursuant to the Adult Education Act; identification of the participants delegated by the customer; liaising with the applicant, registration of contact details in the internal management system; performing the obligation to provide information. 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, and to perform the obligation to provide information.
- b) *In the case of notifiable training courses:* preparation of the conclusion of an adult training contract pursuant to the Adult Education Act; identification of the participants delegated by the customer; liaising with the applicant, registration of contact details in the internal management system; compliance with data reporting obligation.
- c) *For other knowledge sharing / development solutions not governed by the Adult Education Act:* identification of participants; liaising with the applicant, registration of contact details in the internal administration system; and in the case of corporate orders, the contractual performance of the service provided and its certification.
- d) The purpose of recording data in the internal administration system is the internal recording of the data necessary for the organisation of the training and for keeping contact with the trainee, and for the operation of the administration system.

- e) 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 personalised training in case of individual and mentored training courses, establishing contact with the participant, and to perform the obligation to retain documents specified in Section 16 of the Adult Education Act.

2.1.3 The legal basis of data processing

- a) The **legal basis** of the processing of personal identification data is the disclosure of data necessary for the delivery of the adult training contract [point b) of Article 6(1) of the GDPR], and in case of contact details it is the legitimate interest of Training360 Kft. [point 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 for data processing is the legitimate interest of the client and Training360 Kft. [point 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.
- b) During application, the data required for concluding an adult training contract (Section 2.2) must be provided as it is required by the Adult Education Act, otherwise you will not be able to attend our licensed or notifiable training courses.

Change! The legal basis of processing the education ID is to ensure compliance with the registration and reporting obligation set forth in Section 15 of the Adult Education Act and Section 25/A of Government Decree 11/2020. (II.7.) [point c) of Article 6(1) of the GDPR]. If you do not know your education ID, we will retrieve/request it from the competent authority at your request based on your natural personal identification data, the legal basis of which is the legitimate interest of Training360 Kft. in complying with its registration obligation [point f) of Article 6(1) of the GDPR].

In the case of notifiable training courses, if you declared during the conclusion of the adult training contract that you object to the transfer of certain personal data by Training360 Kft. to the authority, then the authority will delete the data that you prohibited from transmission after retrieving/requesting your education ID. However, the data will still be stored in the system of Training360 Kft. as the data controller on the basis of the Adult Education Act [compliance with a legal obligation, point c) of Article 6(1) of the GDPR].

- c) The legal basis of processing data in the internal administration system is the legitimate interest of Training360 Kft. [point f) Article 6(1) of the GDPR] to operate its own corporate management system.
- d) 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 courses it is the legitimate interest [point f) of Article 6(1) of the GDPR] of Training360 Kft. to provide you with the appropriate quality of service through tailor-made training.

2.1.4 Data retention period

- a) Paper-based application forms and the data recorded in our electronic filing system will be retained for 8 years pursuant to point b) of Section 16 of the Adult Education Act or, in the case of training courses financed from tender funds, for the retention period specified in the tender specifications (usually 10 years).

- b) 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 and its implementing regulations require adult training institutions to **report data**. Accordingly, Training360 Kft. reports data pursuant to Section 15 of the Adult Education Act into the Adult Education Data Reporting System (FAR) on the training course and the participants as well as anonymous data into the National Statistical Data Collection Program (OSAP) as required in Section 21 of the Adult Education Act.

Change! In the case of *training courses licensed* on the basis of the Adult Education Act and Section 15 of Government Decree 11/2020 (II.7.) that is effective from 01.09.2020., Training360 Kft. shall disclose to the public adult education authority the following personal data recorded in the adult training contract: sex, education ID, highest education level, name, mother's name, place and date of birth, tax identification number, e-mail address.

In the case of notifiable training courses, when concluding the adult training contract, you may prohibit for Training360 Kft. to record in the system and forward to the authority your following data: name, place and date of birth, mother's name and/or e-mail address and/or tax identification number, when Training360 Kft. retrieves/requests your education ID. If the transmission of data is prohibited, the data concerned will be deleted from the Adult Education Data Reporting System after retrieving/requesting the education ID.

If the training is organised 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 courses, 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 authorised under the Adult Education Act, an adult training contract will be entered into between you and Training360 Kft. under which we will process the personal data specified in Section 21 of Government Decree 11/2020 (II.7.) pursuant to Section 13 of the Adult Education Act:

- identification data of a natural person (name, mother's name, place and date of birth),
- sex,
- nationality, title for residence in Hungary for non-Hungarian citizens and the number and title of the attesting document;
- home address, mailing address, electronic mail address and phone number,
- social security number,
- tax identification number.

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 to ensure compliance with a legal obligation [Sections 13, 16, 21 of the Adult Education Act and Section 21 of Government Decree 11/2020 (II.7.)] [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

Based on mandatory data reporting:

- a) In the case of *training courses licensed* on the basis of the Adult Education Act and Section 15 of Government Decree 11/2020 (II.7.) that is effective from 01.09.2020., Training360 Kft. shall disclose to the public adult education authority the following personal data recorded in the adult training contract: sex, education ID, highest education level, name, mother's name, place and date of birth, tax identification number, e-mail address.
- b) *In the case of notifiable training courses*, when concluding the adult training contract, you may prohibit for Training360 Kft. to record in the system and forward to the authority your following data: name, place and date of birth, mother's name and/or e-mail address and/or tax identification number, when Training360 Kft. retrieves/requests your education ID. If the transmission of data is prohibited, the data concerned will be deleted from the Adult Education Data Reporting System after retrieving/requesting the education ID.

If the training 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 Training documentation

2.3.1 Type of data processed

- a) *During the training*, we will keep an attendance list and, in the case of licensed training courses, a progress log showing your name, signature and any possibly absence. In the case of Live Virtual Classroom (LVC) training courses, the attendance sheet may be substituted by a screenshot of the list of participants logged in to the training stream created by the instructor or the training organiser.

- b) If you require vendors' official *online training materials* (e.g. in case of Microsoft, Cisco, VMware, Oracle, IBM training courses), Training360 Kft. 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 courses, also your telephone number and workplace.
- c) In the case of training courses 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.
- d) In the case of Live Virtual Class (LVC) training courses, by logging in and participating in the training, you acknowledge that the training participants, the instructors and the organising staff of Training360 Kft. can hear your voice and, if you allow it, see your camera image, or in the case of sharing, a screenshot of your shared applications. In the case of Live Virtual Class (LVC) training courses, sound and video recording is not made by default, only if required by the conditions of a domestic or European Union tender or if, in the case of individual group training, the Customer requires it and all employees of the Customer participating in the training and Training360 Kft. give their consent to this. In this case, the recording is managed by the Customer. In all other cases, Training360 Kft. shall inform the participants about the fact of the recording before the training.
- e) If the training ends with an examination, the result can be certified by an examination certificate document which records your name, place and date of birth, the completed training and its result. *Completion of the training* will be certified by issuing a certificate of attendance, which contains your name, the name of the training you have completed, and a serial number*.
- f) If the training takes place at the location of Training360 Kft., on the first day of the training the participants will receive an entrance card (guest card) for access and elevators in the office building, the name, signature and card identification number of the participant will be stored on the receipt.

***Change from 01 September 2020!** In the case of training courses started or licensed after 01 September 2020 and subject to notification pursuant to Section 13/B of the Adult Education Act and Section 22 of Government Decree 11/2020 (II.7.), the *Certificate* attesting completion of the training is issued centrally and will be made available to the participant electronically or on paper from the reporting system of the public adult education administration authority.

In the case of *licensed training courses*, the Certificate will be issued/sent after the completion /assessment of the training.

In the case of notifiable training courses, the participant may request Training360 Kft. to issue a Certificate in a separate declaration when concluding the adult training contract (unless they previously objected to the transmission to the Adult Education Data Reporting System of the data required for the issuance and delivery of such certificate).

2.3.2 The purpose of data processing

- a) 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 ensure compliance with 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.
- b) When applying for *online training materials*, in the case of official PeopleCert training materials, the purpose of data processing is to upload the database required by the vendor (or by ITpreneurs, 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.
- c) In the case of *image and/or audio recordings* made during the training, the purpose of data processing is to comply with the tender specifications and to certify the completion of the training. If the purpose of the recording is to fulfil the customer's request or quality assurance, or increasing user experience or the effectiveness of the training (review, repetition), Training360 Kft. will inform the participants accordingly before the start of the training.
- d) *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 a training course funded by national or EU grant sources, that it has complied with the tender specifications. The purpose of issuing the certificate is to certify completion of the training in accordance with the provisions of the Adult Education Act
- e) The data management purpose of the document certifying the receipt of the entrance cards is to document and certify that the participant has received the entrance card and to check that it has been returned to Training360 at the end of the training.

2.3.3 The Legal Basis of Data Processing

- a) In the case of *attendance sheets and progress logs of the training course*, the **legal basis** of data processing is to ensure compliance with 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 Kft.'s legitimate interest to certify the performance of the contract between them [point f) of Article 6(1) of the GDPR].
- b) In the case of an official vendor *online training material*, the legal basis of data processing is the legitimate interest of Training360 Kft. 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.
- c) In respect of the *images and/or sound recordings* made during the training, the legal basis of data processing is the legitimate interest of Training360 Kft. and the client [point f) of Article 6(1) of the GDPR] to comply with the tender specifications and certify such compliance. In the

case of a recording for the purpose of quality assurance, the legal basis of data processing is the legitimate interest of Training360 Kft. in controlling and improving the quality of its services [point f) of Article 6(1) of the GDPR].

- d) With regard to personal data processed during the issuance of a *certificate of attendance*, the legal basis of data processing is to ensure compliance with 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 Kft. and the employer [point f) of Article 6(1) of the GDPR] to comply with the tender specifications and certify such compliance. The legal basis of issuing the *certificate* is to ensure compliance with the obligation set forth in Section 13/B of the Adult Education Act [point c) of Article 6(1) of the GDPR].
- e) The personal data processed in connection with the receipt of the entrance cards is the legal basis of the data processing in the legitimate interest of Training360 Kft. (Article 6 (1) (f) of the GDPR), for the purpose of property security and information security.

2.3.4 Data retention period

- a) *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 *certificate* shall be recorded by the adult education administration authority in its electronic system. Entrance card documents are handled and retained along with training documents.
- b) The data of official vendor's *online training materials* is stored by the respective vendor / training material provider, i.e. Training360 Kft. does not record it.
- c) The video and/or sound recordings made during the training are either stored by the Customer or forwarded by Training360 Kft. to the tender beneficiary (Customer) after making the same; i.e. the recordings are not stored by the data controller.

2.3.5 Data transmission

If the training 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, e-mail address, workplace, address, telephone number, country, language):

- For official Microsoft Training Courses: Arvato Systems Group, An der Autobahn 200, 33333 Gütersloh and Microsoft Corporation, One Microsoft Way, Redmond, Washington, U.S.
- For official Cisco training courses: Cisco Systems, Inc., Corporate Headquarters, 170 West Tasman Dr. San Jose, CA 95134 USA

- For official IBM training courses: Global Knowledge UK, Mulberry Business Park, Fishponds Road, Wokingham, Berkshire, RG41 2GY and IBM Corporation, Armonk, New York, U.S.
- For official VMware training courses: VMware, Inc., 3401 Hillview Ave., Palo Alto, CA 94304
- For official Oracle training courses: Oracle Corporation, 500 Oracle Parkway, Redwood Shores, CA 94065
- For official PeopleCert training courses: PeopleCert Inc., Themistokli Dervi 40, Street 1066, Cyprus 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 points (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 Kft. 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 trainee is signed up by their employer (customer of the training), including when the training is financed from tender funds, we will disclose to the employer information on attendance at the training course, the completion of the training and, where images and/or sound recordings must be made, we will also deliver them to the employer.

The data of the certificate will be uploaded to the reporting system of the public adult education administration authority.

2.4 Invoicing

2.4.1 Type of data processed

If you pay the training fee, we will process your name, address and the amount of the training 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 training 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 Kft. and the meal service provider.

2.4.3 The legal basis of data processing

In the case of payment by the customer, the **legal basis** for data processing is the legitimate interest of Training360 Kft. [point 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 and the customer's interest in identifying the relevant cost.

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 Kft. with the involvement of the following **data processor**:

Firm name: BPION Services Kft. (Valid from 1 June 2020)
Registered seat: 1139 Budapest, Váci út 99. 2. em.

3. The location of data storage

The data relating to the data processing specified in point 2 is stored in the secure on-premise server park of Training360 as well as in Microsoft cloud systems (Office 365, Azure, Dynamics CRM 365). Confidential and strictly confidential documents containing personal data are processed with proper authorisation and access control, and their paper-based versions (documents) are managed in a secure manner and stored in a lockable place (archive, lockable offices and cabinets).

Data transmission: the data related to the data processing specified in point 2 will also be stored and saved partly using the cloud services provided by Microsoft. Due to the nature of the service, your personal data may be transferred outside the European Union. The legal basis of this data transmission is point c) of Article 49(1) of the GDPR, the performance of a contract between Training360 and Microsoft in order to be able to provide the service to you. The security measures that Microsoft applies are described here:

- <https://privacy.microsoft.com/hu-HU/privacystatement>
- <https://docs.microsoft.com/hu-hu/dynamics365/get-started/gdpr/>
- <https://azure.microsoft.com/en-us/support/legal/sla/>
- <https://www.microsoftvolumelicensing.com/Downloader.aspx?DocumentId=17457>

4. Your rights relating to data processing

As a data subject, you have the right to access, request the rectification or erasure of your personal data processed by Training360 Kft., and object to the processing of your data processed on the basis of a legitimate interest, 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). We will respond to your request within 1 month.

Complaints may be filed at the following contact details:

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

If we process your personal data that can be linked to Microsoft Corporation (e.g., your manufacturer ID, previous exams, courses) and you submit a data request to Training360 Kft. in connection with this, we will record these requests to demonstrate the proper processing of personal data related to Microsoft. The legal basis for this is Microsoft's legitimate interest in verifying the security of the processing of personal data with its partners, and in the case of Training360 Kft., to comply with its partnership agreement. The duration of the processing of data relating to data subjects' requests is 5 years, and the information in the records may be inspected by Microsoft during an audit and it must be informed about the processing of the requests.

You can file a complaint with respect to the processing of your data to the Hungarian National Authority for Data Protection and Freedom of Information (www.naih.hu, address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1374 Budapest, Pf. 603., phone: +36-1-391-1400, e-mail address: ugyfelszolgalat@naih.hu), or you may pursue your claim through a court of jurisdiction.

The Privacy Notice of Training360 Kft. is accessible in the footer of the Training360 website where you can read more details about your rights in relation to the processing of your data (Data Protection and Privacy Notice).