

PRIVACY NOTICE

to inform you, the data subject, about the rules of data processing and data protection

1. What principles are followed during the processing of data?

Principles that are considered on your personal data:

- a) they are processed fairly, lawfully and transparently.
- b) they are collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c) data collected and processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization').
- d) they are also accurate, up-to-date and if they are not, they will be deleted or corrected with no delay ('accuracy').
- e) they are kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed. ('storage limitation')
- f) they are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

2. Contact information

Data processor: **AT Workshops BP Ltd.** (hereinafter: Data processor)

Website: www.atworkshopsbudapest.hu

Address, postal address: 1082 Budapest, Kisfaludy utca 40. földszint 4.

Company register number: 01-09-400042

Tax number: 27838891-1-42

Community tax number: HU27838891

Phone number: +36 20 278 9961

E-mail address: contact@atworkshopsbudapest.hu

Your data is processed by data controllers. The list of data controllers can be found in Appendix 1. If any alteration happens regarding data controllers, the changes will be recorded in the current notice.

The data processed regarding the data subjects can be found in Appendix 2.

Further questions in connection with data processing can be asked at contact@atworkshopsbudapest.hu and at the postal address. The answer must be sent to them without delay and at the latest within one month to your given address.

3. Further information about data processing

3.1 Data provision

You give your personal data voluntarily during our interactions, therefore please ensure that your data are real, correct and accurate because you are responsible for these. Incorrect, inaccurate or deficient data can make providing services to you more difficult.

Possible consequences of failure to provide such data:

- if the aim of the data provision is to comply with a legal obligation, the fulfilment of such legal obligation becomes impossible
- if the aim of the data provision is to prepare a contract, the failure of the provision of data may result in the failure of signing a contract
- if consent is not given, the relevant data processing cannot be performed

Automatized decision-making is not applied regarding the data subjects, including profiling

3.2 Data processing based on the consent of the data subjects

If the data processing is based on the consent of the data subject, the data subject can withdraw their consent free of charge at any time. According to Article 9(2) point (a), if your data is special (e.g.: it concerns your health) it can only be processed with your explicit consent.

Please be aware that in case a fulfilment of a legal obligation or the protection of legitimate interests is needed, your data can further be processed and the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

3.3 Data processing based on the preparation and performance of a contract

Data processing may be needed for the preparation or performance of a contract.

3.4 Data processing based on a legal obligation

Part of the data processing is based on such law that makes it obligatory to process data, e.g.: laws regarding accounting and taxes.

3.5 Data processing based on legitimate interests

Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject. One of the main features the legal basis defined in Article 6(1) point (f) of GDPR is that referring to this legal basis may legitimize the processing of data regardless of consent, but only if the extent to which the data processing limits your right to privacy is proportionate.

In case of a data processing based on legitimate interests, a legitimate interests assessment is conducted.

3.6 Data processing based on contracting parties

For contracting parties and their natural person representatives, a separate privacy notice is given for the preparation and the duration of the contract. Appendix 1 and 2 contain further information regarding the data processing.

3.7 Who can be formed about the data of the data subjects?

Only those employees that are authorized regarding data processing can access the data of data subjects, or they can be transferred based on the mandate of clients or within the regulations of law, e.g. to the revenue office etc.

Provisions in the contract ensure that the data processors do not use your personal data for purposes outside of data processing. Employees participating in the processing of data are authorized to access your personal data only to an extent that was agreed on prior to the processing and only under the obligation of confidentiality. The list of the data processors can be found in Appendix 1.

Data can only be transferred to other countries according to the GDPR (chapter 5) with appropriate guarantees. Should such transfer of data happen, the data subject will be informed in advance.

Information, data or documents can be requested by the court, the prosecution and other authorities (e.g. police, tax office, Hungarian National Authority for Data Protection and Freedom of Information). In these cases legal obligation must be performed for providing data but only to a necessary extent that can be justified by their legitimate purpose.

3.8 Protection of data

Your personal data are protected by technical and other measures. You are also granted with the security and availability of your data, and they are prevented from being accessed, modified, damaged and published unlawfully or being misused in any other way.

By organized measures, the physical accessibility is supervised. Employees are also constantly educated and paper-based documents are stored with appropriate protection. By technical measures, encryption, password securisation and antivirus softwares are used. Please note that transferring data through the internet cannot be considered as a way of properly secure data transferring. These processes are as secure as possible, but responsibility cannot be taken for data transferring through the website. Compliance with all the regulations regarding the security of your data is assured with great care to prevent them from any misuse.

4. Your rights and possibilities of legal remedy

You

- can ask for information about your data processing,
- can ask for the rectification of your personal data,
- can object the processing of your data and ask for the erasure and restriction of them (if there is a legal basis for it),
- have the right to data portability (if there is a legal basis for it),
- have the right to a legal remedy,
 - can complain or start a legal procedure at the supervisory authority (<https://naih.hu/panaszuegyintezes-rendje.html>). You can complain in the member state of your home, workplace or the place where the unlawfulness happened.

Supervisory Authority: Hungarian National Authority for Data Protection and Freedom of Information

- Headquarters: 1055 Budapest, Falk Miksa utca 9-11
- Postal Address: 1363 Budapest, Pf.: 9.
- Phone number: +36 (1) 391-1400, +36 (30) 683-5969, +36 (30) 549-6838
- Fax: +36 (1) 391-1410
- E-mail: ugyfelszolgalat@naih.hu
- Website: <https://naih.hu/>

4.1 Right to rectification

You have the right to ask the controller for the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, even by a supplementary statement. For some processing operations, the right to rectification is excluded, given the specific nature of the processing (e.g. processing of video recordings).

- Government Decree No 73/2021 (VI. 30.) on the detailed rules for contracts between consumers and businesses for the sale of goods and the supply of digital content and services

4.2 Right to erasure ('right to be forgotten')

You have the right to ask the controller for the erasure of personal data concerning you without undue delay and the controller has to erase your personal data without undue delay where one of the following grounds applies

- your personal data are no longer necessary in relation to the purposes for which they were processed
- you withdraw consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing
- you object to the processing and there are no overriding legitimate grounds for the processing,
- your data have been unlawfully processed
- your personal data has to be deleted because of a legal obligation in Union or Member State law

• your personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

If your personal data has been shared, other data controllers must be warned by all technological means that you have requested the deletion of your data on every platform.

You cannot request the erasure of your data if the processing of them is necessary:

- for exercising the right of freedom of expression and information,
- because the processing has to be performed according to a Union or Member State law or if its a performance of a task carried out in the public interest or in the exercise of official authority,
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes or if this erasure would make the processing of data impossible or incredibly difficult,
- for the establishment, exercise or defence of legal claims.

4.3 Right to restriction of processing

You have the right to ask the controller for the restriction of processing where one of the following applies:

- you don't agree with the accuracy of these data, in this case your data will be restricted for a period of time, enabling the correction of them,
- the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead,
- we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims, or
- you have objected to processing and you're waiting for the verification whether our legitimate grounds override those of yours.

Where processing is restricted, your personal data must - with the exception of storage - only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

You will be informed, who have requested the restriction of the processing of your data, if this restriction is over.

All controllers who have processed these data are informed, about all rectifications, erasures or restrictions, except if it's impossible or extremely difficult. If you ask for the list of these controllers, it must be provided to you.

4.4 Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without any obstruction to which your personal data have been provided, where

- the processing is based on consent according to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract according to point (b) of Article 6(1) and

- the processing is done by automated means.

In exercising your right to data portability, you have the right to have your personal data transmitted directly from one controller to another, where technically possible. The right to data portability shall not adversely affect the rights and freedoms of others.

4.5 Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6(1), including profiling based on those instructions. Your personal data is no longer processed the compelling legitimate grounds are demonstrated for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where your personal data are processed for scientific or historical research purposes or statistical purposes, you, on grounds relating to your particular situation, have the right to object to processing of your personal data unless the processing is necessary for the performance of a task carried out for reasons of public interest.

4.6 Exercising your rights as a data subject

If you request information about your personal data processed by us or by our commissioned data controller, we must provide these information about

- your data,
- the source of these data,
- the purpose and legal basis of the processing of your data
- the duration of the processing and if it is not possible, the aspects of determining the duration
- the name and address of the data controllers and their activities
- the circumstances, effects and the measures of the prevention of personal data breaches, and
- the legal basis and the addressee if we transfer your data.

We must inform you as soon as we can but within maximum one month. The information is provided to you without expenses, except if you have already submitted a request for information in the same data category in the past year. If your request is undoubtedly ill-founded or – especially because of its repetitive nature – exaggerating, we can charge you a reasonable price based on the administrative expenses that are required in order for us to provide the requested information or take the requested measures or we can reject taking the measures you requested.

We refund the expenses that have already been paid by you if we controlled your data unlawfully or we had to correct them because of your request. We can reject to inform you only if we have a legal basis for it and we have to refer to the exact legislative place where it's stated. We must also inform you about your right to a legal remedy and your right to appeal at the supervisory authority.

If we don't fulfill your request of rectification, restriction or erasure, we must inform you about the reason of our rejection in writing or – if you give your consent to it – using an electronic device as soon as possible but in maximum one month. We must also inform you about your right to a legal remedy and your right to appeal at the supervisory authority. You can do the latter in the member state of your home, workplace or the place where the unlawfulness happened.

If you reject the processing of your personal data, we must answer your request as soon as we can but in maximum one month and inform you about our decision in writing. If we decided that your request is rightful, we stop the further processing, collecting and transferring of your data. We also notify all of the other controllers who processed your data and who are obligated to take measures in order to fulfill your request.

We can reject fulfilling your request if we prove that the processing of your data is justified by such legitimate reasons that are superior to your interests, rights and freedoms or are connected to the establishment, exercise or defence of legal claims. If you don't agree with our decision or the deadline expires for our response, you can appeal at the supervisory authority in 30 days from receiving our response or from the last day of the deadline of our response.

Please contact us before appealing at the supervisory authority, in order to find a solution in the fastest and most efficient way.

5. Most important laws relating to data processing

- 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 (GDPR)
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Privacy Act)
- Act CXXX of 2016 on the Code of Civil Procedure (Ptk.)
- Act CLV of 1997 on Consumer Protection (Fgy.tv.)
- Act CVIII of 2001 on Electronic Commerce and on Information Society Services (Ektv.)
- Government Decree 5/2014. (II. 26.) on Detailed Rules governing contract concluded between consumers and businesses
- Act XLVII of 2008 on the Prohibition of Unfair Business-to-Consumer Commercial Practices (Fttv.)
- Regulation (EU) No 524/2013 of the European Parliament and of the Council of 21 May 2013 on online dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC (Regulation on consumer ODR)
- Government Decree No 73/2021 (VI. 30.) on the detailed rules for contracts between consumers and businesses for the sale of goods and the supply of digital content and services

6. Modification of Privacy Notice

Our company reserve the right to modify this privacy notice and will properly inform the parties involved.

Monor, 27 April 2022

AT Workshops BP Ltd.

1 Appendix 1 – Data controllers

NAME	ADDRESS	ACTIVITY
Ecofact Kft.	2200 Monor, Mátyás király utca 15/a.	<i>accounting</i>
PowerPages Kft.	2724 Újlengyel, határ út 12.	<i>storage and IT services</i>
Bereznai Erika e.v.	1163 Budapest, Veres Péter út 51.	<i>administrative service</i>
Pápa Gyöngyvér	1074 Budapest, Csengery utca 7. l.em 12/a.	<i>interpreter</i>
Jakab Szilvia	1043 Budapest, Csányi László utca 22. 7/a.	<i>interpreter</i>

2 sz. melléklet - Az érintettekkel kapcsolatban kezelt adatok

Type of activity and the purpose of the data processing	Basis for the data processing	Processed data	Duration	who can access the data	Recipient (data transfer)	Purpose of and legal basis for data transfer	Source of data
Data processing regarding the natural person contracting parties, in order to prepare, sign and perform the contract and maintain the business relationship with them	Preparation and performance of a contract [GDPR 6(1)(b)]		5 years after the performance of the contract			Legal obligation [GDPR 6(1)(c)]	
	Legal obligation [GDPR 6(1)(c)]	data of the contracting party (name, e-mail address, telephone number)	in case of a legal obligation, the duration determined by law (8 years)	Data processor accounting	National Tax and Customs Administration (NAV)	Performance of a contract [GDPR 6(1)(b)]	(future) contracting party
	In case of special categories of personal data (concerning health) the explicit consent of the data subject [GDPR 6(1)(a) and 9(2)(a)]	data included in and required for the preparation and performance of the contract	in case of consent, until the withdrawal of the consent or 5 years after the performance of the contract		recipients included in the contract	In case of special categories of personal data (concerning health) the explicit consent of the data subject [GDPR 6(1)(a) and 9(2)(a)]	
Data processing of the people who represent our contracting parties, in order to prepare, sign and perform the contract and maintain the business relationship with them	It is the legitimate interest of our business partner that we can process the data of their representative during our business relationship [GDPR 6(1)(f)]	data of the representative of the contracting party (name, position, telephone number, e-mail address, other data required to maintain contact)	5 years after the performance of the contract or the termination of the representation	Data processor accounting	National Tax and Customs Administration (NAV)	Legal obligation [GDPR 6(1)(c)]	representative
					recipients included in the contract	It is the legitimate interest of our business partner that we can process the data of their representative during our business relationship [GDPR 6(1)(f)]	(future) contracting party
Administration regarding the training course (list of registrations, attendance sheet, curriculum etc.)	Legal obligation [GDPR 6(1)(c)]						
	Preparation and performance of a contract [GDPR 6(1)(b)]	name, contact data (e-mail address, telephone number), date, place, other personal data included in the given document	1 year	Data processor	only in irregular cases		data subject p.e. person providing education
	It is the legitimate interest of our company that we can document the training courses to						

Data processing in order to exercise our legal rights (taking measures because of a non-contractual performance, recovering legal claims etc.)	<p>the expected extent [GDPR 6(1)(f)]</p> <p>It is the legitimate interest of our company that we can take the necessary steps and exercise our legal rights in case of a suspected infringement [GDPR 6(1)(f)]</p> <p>Preparation of a contract [GDPR 6(1)(b)]</p>	<p>name, data for identification (name of the represented company, address etc.), contact data (telephone number, e-mail address, address etc.)</p> <p>data related to the subject of the claim (e.g. data of the invoice etc.)</p>	until the termination of the legally binding procedure	Data processor	attorney, police, court etc.	<p>It is the legitimate interest of our company that we can take the necessary steps and exercise our legal rights in case of a suspected infringement [GDPR 6(1)(f)]</p>	<p>data subject</p> <p>p.e.</p> <p>person or organization contributing to the recovery of legal claims</p>
Data processing related to customer service	<p>It is the legitimate interest of our company that we can fulfill the requests sent to us [GDPR 6(1)(f)]</p> <p>In case of special categories of personal data (concerning health) the consent of the data subject [GDPR 6(1)(a) and 9(2)(a)]</p> <p>Consent of the data subject [GDPR 6(1)(a)]</p>	<p>Contact data of people who have requests to our company and people requesting information about our (name, e-mail address, telephone number) and data that have been collected during the contact</p>	2 years	Data processor	only in irregular cases		data subject
Making of recordings at training courses, events (picture and video) <i>recordings are anonymized if possible</i>	<p>In case of special categories of personal data (concerning health) the explicit consent of the data subject [GDPR 6(1)(a) and 9(2)(a)]</p>	<p>recording, image in the recording, act, conclusions drawn from such act, meta data of recording (date, location data etc.)</p>	cannot be scrapped (only if it is the decision of the p.e.), or until the withdrawal of consent	Data processor			data subject
Storage of recordings made in training courses and events (picture and video) <i>All made and stored recordings are</i>	<p>Consent of the data subject [GDPR 6(1)(a)]</p> <p>In case of special categories of personal data</p>	<p>recording, image in the recording, act, conclusions drawn from such act, meta data of recording (date, location data etc.)</p>	cannot be scrapped (only if it is the decision of the p.e.), or until the withdrawal of consent	Data processor			data subject

<i>anonymized if possible</i>	(concerning health) the explicit consent of the data subject [GDPR 6(1)(a) and 9(2)(a)] Consent of the data subject [GDPR 6(1)(a)]						
Data processing relating to recordings published on our website or on other social media <i>disclosed recordings are anonymized if possible</i>	In case of special categories of personal data (concerning health) the explicit consent of the data subject [GDPR 6(1)(a) and 9(2)(a)] It is the legitimate interest of our company that we can make recordings at our training courses or educational events to record our activity [GDPR 6(1)(f)]	recording, image in the recording, act, conclusions drawn from such act, meta data of recording (date, location data etc.)	cannot be scrapped (only if it is the decision of the p.e.), or until the withdrawal of consent	Data processor			data subject
Making, storage and disclosure of recordings that cannot be considered as portraits	It is the legitimate interest of our company that we can make recordings at our training courses or educational events to record our activity [GDPR 6(1)(f)]	recording, image in the recording, act, conclusions drawn from such act, meta data of recording (date, location data etc.)	cannot be scrapped, or in case of an objection, until the acceptance of the objection	Data processor			data subject
Issuing of an invoice or certificate completion of orders, in order to perform and accounting and taxing obligations	Legal obligation [GDPR 6(1)(c)]	Personal data required to issue an invoice or certificate according to the relating accounting and taxing regulations	8 years	Data processor accounting	National Tax and Customs Administration (NAV)	Legal obligation [GDPR 6(1)(c)]	contracting party
Non-disclosure agreements Management of non-disclosure agreements (trade secret, processing of personal data etc.)	It is the legitimate interest of company that we can protect our trade secrets and know-hows [GDPR 6(1)(f)]	data included in the non-disclosure agreement	cannot be scrapped, or according to the decision of the p.e.	Data processor	attorney, competent authority, court	It is the legitimate interest of our company that we can exercise our legal rights in case of a suspected infringement [GDPR 6(1)(f)]	person agreeing to the non-disclosure agreement p.e.
Personal data included in the portfolio presented at educational events <i>we always intend to anonymize the personal data included in the portfolio and we expect the same from our business partners</i>	Performance of a contract by the person who made the portfolio [GDPR 6(1)(b)] consent of the data subject who is included in the portfolio	name, identification data and contact data of the person who made the portfolio name of the person who is included in the portfolio, data that can be found in the portfolio (based on their consent)	5 years after the termination of the contract in case of a data subject who is included in the portfolio until the withdrawal of their consent, or 5 years after the	Data processor person providing education	in occasional cases, based on a separate notice		person who makes the portfolio person who is included in the portfolio person

	[GDPR 6(1)(a)]							
	In case of special categories of personal data (concerning health) the explicit consent of the data subject [GDPR 6(1)(a) and 9(2)(a)]		termination of the contract					providing education
		name, identification data provided by the complainant, the content of the complaint and the answer given to it, the content of the <u>register made of the complaint</u> :						
		a) name and address of the complainant,						
		b) the time, place and way of complaint,						
		c) the detailed description of the complaint, the register of the documents and other evidences of the complainant,	the company is obligated to keep the register of the complaint and the					
Administration of complaints		d) the statement of our company about our opinion on the complaint, if the immediate examination of the complaint is possible,	counterpart of the answer to it for 3 years, and present it to the supervisory authority upon their request					
The purpose is processing of the complaints received by our company	legal obligation (GDPR Article 6, paragraph c)	e) the signature – except if it is received through telephone or other electronic communication services - of the person reporting the complaint and the complainant,		Data processor	supervisory authority	Legal obligation [GDPR 6(1)(c)]		
(Act CLV of 1997. 17/A §)		f) the time and place of the register,			attorney	It is the legitimate interest of our company that we can exercise our legal rights in case of a suspected infringement [GDPR 6(1)(f)]	complainant p.e.	
		g) the identification number of the complaint if it is received through telephone or other electronic communication services.						
data processing related to the requests of data subjects	Legal obligation [GDPR 6(1)(c)]	data included in the request of the data subject and in the documentation (answer) related to the request of the data subject	5 years	Data processor	data transfer only in irregular cases (Hungarian National Authority for Data Protection and	Legal obligation [GDPR 6(1)(c)]	data subject	

Register of data breaches	Legal obligation [GDPR 6(1)(c)]	personal data included in the register of data breaches	follows the duration for which the data related to the data breach has to be preserved	Data processor	Freedom of Information (NAIH), court etc.) data transfer only in irregular cases (Hungarian National Authority for Data Protection and Freedom of Information (NAIH), court, police etc..)	Legal obligation [GDPR 6(1)(c)] It is the legitimate interest of our company that we can take the necessary steps and exercise our legal rights in case of a suspected infringement [GDPR 6(1)(f)]	data subject
Your visit of our website Our purpose is to ensure the proper and high quality operation of our website, supervision and correction of the quality of our services, the identification of malicious visitors of the website to measure the number of visits, for statistical purposes	It is the legitimate interest of our company that we provide high-quality service to the visitors of our website [GDPR 6(1)(f)]	IP address time of visit data of visited subpages, type of your browser and operating system	12 month	Data processor IT service provider	data transfer only in irregular cases (Hungarian National Authority for Data Protection and Freedom of Information (NAIH), police etc..)	It is the legitimate interest of our company that we can take the necessary steps and exercise our legal rights in case of a suspected infringement [GDPR 6(1)(f)]	data subject
Operation of the newsletter database for the purpose of sending newsletters	consent of the data subject who subscribes to the newsletter [GDPR 6(1)(a)]	name, e-mail address	as long as the newsletter database functions, and until the withdrawal of consent	Data processor IT service provider	data transfer only in irregular cases		data subject
Subscription to a newsletter	consent of the data subject who subscribes to the newsletter [GDPR 6(1)(a)]	name, e-mail address	as long as the newsletter database functions, and until the withdrawal of consent	Data processor IT service provider	data transfer only in irregular cases		data subject
Operation of the direct marketing (DM) database for the purpose of sending DM letters	consent of the data subject who subscribes to the DM letter [GDPR 6(1)(a)]	name, e-mail address/ postal address	as long as the DM database functions, and until the withdrawal of consent	Data processor IT service provider	data transfer only in irregular cases		data subject
Subscription to Direct marketing (DM) letters	consent of the data subject who	name, e-mail address/ postal address	as long as the DM database	Data processor IT service provider	data transfer only in irregular cases		data subject

Robinson-list
managing the data base
of those data subjects
who do not wish to
receive a direct marketing
letter or newsletter

subscribes to the
DM letter
[GDPR 6(1)(a)]

It is the legitimate
interest of our
company to keep a
record of the
addresses to which
we cannot send
messages
[GDPR 6(1)(f)]

the address included in the
withdrawal of consent (e-
mail address /postal
address)

functions, and
until the
withdrawal of
consent

cannot be
deleted, or
according to the
decision of the
p.e.

Data processor

data transfer only in
irregular cases

data subject