

DATA PROCESSING INFORMATION LETTER

The Data Controller hereby informs you about the information concerning the processing of your personal data:

I. Data concerning the data controller:
Name: **Green Fox Academy Korlátolt Felelősségű Társaság**
Registered office: 1062 Budapest, Andrásy út 66.
Telephone number: [+36 70 362 6323](tel:+36703626323)
Email address: hello@greenfoxacademy.com
hereinafter: **“Data Controller”**

Data of the representative of the data controller:

Name: **Kristóf Tibor Bárdos as managing director**
Address: 1062 Budapest, Andrásy út 66.
Email address: kristof.bardos@greenfoxacademy.com

If you have any questions concerning this Information or you wish to exercise your rights under this Information, then please, contact us using any of the contact options above and we will gladly answer your questions.

II. Data protection commitments of the Data Controller:

The Data Controller accepts the provisions of this Information Letter as binding. The Data Controller agrees to comply with all the effective legal regulations concerning data processing, in this regard especially Regulation (EU) 2016/679 of the European Parliament and of the Council on data protection (“**GDPR**”). The Data Controller reserves the right to change this information at any time and shall notify you about possible changes in due time.

III. Information concerning data processing:

3.1. Data processing for the purpose of sending business newsletters and business offers

a) Purpose of data processing: identifying data subjects and differentiation between them, establishing contact, sending newsletters, preparation of statistics, sending e-mail newsletters containing business advertisement to data subjects, updates on actual information, events, promotion events, preparing personal offers.

b) Legal basis for data processing: your voluntarily given consent. However, **you are entitled to revoke your consent at any time**, although it does not concern the legality of data processing performed before the revocation.

c) Scope of controlled data: name, job title, e-mail address, telephone number, other contact details, if applicable, name of the business partner

d) Addressees to whom your personal data is disclosed: the employees of the Data Controller to the extent necessary for the performance of their duties and persons providing legal assignments to the Data Controller

e) The Data Controller does not forward your personal data to third countries or to international organizations.

f) Duration of storing the personal data: Five (5) years from your latest activity (e.g. clicking on a newsletter,), but no longer than the withdrawal of consent.

g) The provision of your personal data is not based on legal regulations or contractual obligations, providing personal data is not a prerequisite for concluding a contract. Consequence of failure to provide data: The Data Controller will not be able to send newsletter, business offers or information to its business partner.

h) The Data Controller does not use automated decision making in the course of managing your personal data.

IV. Your rights concerning data processing:

You also have the following rights concerning the processing of your personal data:

4.1. Right to access:

You have the right to request information through Data Controller's contact details concerning whether the processing of your personal data is in progress, and if such data processing is in progress, then you have the right to know:

- the personal data;
- the legal basis;
- the purpose of the data processing;
- the duration of the data processing

by the Data Controller, furthermore, to know

- to whom, when, under what legislation the Data Controller provided access to your personal data or to whom he transmitted your personal data;
- the source of your personal data;
- whether the Data Controller uses automated decision making and its logic, including profiling.

At your request for the first time, the Data Controller provides for you the copy of the personal data being controlled free of charge, then the Data Controller might charge a reasonable amount of fee based on administrative costs.

In order to meet the data security requirements and protect your rights, the Data Controller shall make sure that the identity of you and the person wishing to exercise the right of access is the same, therefore, the information, access to your data and the issuance of a copy of them are also subject to identification.

4.2. Right to correction

You may request through the contact details of the Data Controller to change any of your personal data. If you can credibly prove the accuracy of the corrected data, the Data Controller will comply with the request within a maximum of one month and will notify you accordingly.

4.3. Right to deletion

Regarding the data processing purposes in section 3.1 hereof – in respect of the legal basis - You have the right to have the personal data concerning you deleted by the Data Controller without unreasonable delay at your request, and the Data Controller shall delete Your personal data without undue delay if the legal basis of the data processing is no longer applicable.

4.4. Right to restriction of data processing

You have the right to request the restriction of your personal data controlled by the Data Controller through the contact details of the Data Controller (by clearly indicating the restricted nature of the data processing and ensuring that the data processing is separate from other data) if:

- you dispute the accuracy of personal data (in this case the Data Controller will restrict the data processing for the period of checking the accuracy of the personal data);
- the data processing is illegal and you opposes the deletion of data, and requesting the restriction of using instead;
- the Data Controller does not need the personal data any more for data processing purposes, yet you require such data for submitting, enforcing or defending legal claims; or
- you objected to data processing (in this case the restriction is for the period necessary to establish whether the rightful reasons of the Data Controller enjoy priority over your rightful interests).

4.5. Right to objection

Regarding the purpose of the data processing in section 3.1. – in relation to its legal basis – you have no right to objection.

4.6. Right to data portability

Regarding the purpose of the data processing in section 3.1. – in relation to its legal basis – you have the right to receive the personal data through the contact details of the Data Controller that concern you and that you provided for the Data Controller in a structured, commonly used and machine-readable format, and you have the right to forward such data to another data controller without the Data Controller preventing it in relation to the automated data processing operations.

4.7. Procedural rules applicable to the Data Controller in the case of exercising your rights:

Please submit requests aimed at exercising your rights using the contact options indicated in Section I.

The Data Controller shall inform you about measures taken as the result of your request aimed at exercising your right without unreasonable delay but within one month at the most from the reception of the request. This deadline may be extended by an additional two months, considering the complexity of the request and the number of requests, if applicable, about which you shall be informed. The Data Controller shall inform you about the extension of the deadline within one month from receiving the request, indicating the reasons for the delay. If you submitted the request electronically, the information shall be given electronically if possible, except if you request otherwise.

If the Data Controller does not take measures as the result of your request, it shall inform you without delay, but within one month from receiving the request at the latest, about the reasons for not taking measures and about that you may file complaints at any supervisory authority and may exercise your right to judicial remedy.

The Data Controller provides the information and the measure taken free of charge. If your request is clearly unfounded or excessive – especially due to its repeated nature – the Data Controller, considering the administrative costs of providing the requested information or taking the requested measure, may charge a reasonable amount of fee for the administrative costs, or may refuse taking measures based on the request. Proving the clearly unfounded or excessive nature of the request is the burden of the Data Controller.

The Data Controller informs all addressees to whom the personal data was disclosed about all corrections, deletions or limitations of data processing, except if it proves impossible or would require a disproportionate amount of effort. At your request the Data Controller shall inform you about such addressees.

V. Your right to legal remedy:

5.1. Complaint addressed to the Data Controller:

If you have any complaints concerning the processing of your personal data, then please contact us using any of the contact options indicated in Section I.

5.2. Complaint addressed to the Data Protection Authority:

You have the right to file a complaint at a supervisory authority – especially in the European member state according to your usual place of residence, your workplace or the location of the assumed infringement – if, in your opinion, the processing of personal data concerning you violates the GDPR regulation or other legal regulations. The supervisory authority to which the complaint was submitted shall inform you about the procedural developments concerning the complaint and the results of the same, including that you have the right to judicial remedy.

You can file complaints at the Hungarian National Authority for Data Protection and Freedom of Information as supervisory authority:

Name: Hungarian National Authority for Data Protection and Freedom of Information
(Nemzeti Adatvédelmi és Információszabadság Hatóság)

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mail address: 1530 Budapest, PO Box: 5.
Telephone: 06 1 391 1400
Fax: 06 1 391 1410
E-mail: ugyfelszolgalat@naih.hu
Website: <http://www.naih.hu>

5.3. Right to compensation:

Every person who suffered losses as the result of violating the GDPR is entitled to financial compensation and/or grievance fees from the Data Controller or the data processor(s).

The data processor is only responsible for damages caused by data processing if it did not comply with the obligations specified in the GDPR that specifically burden the data processors or if it disregarded the rightful instructions of the Data Controller or acted contrary to them.

If multiple data controllers or multiple data processors are involved in the same data processing and are responsible for damages caused by data processing, every data controller or data processor has joint and several liabilities for the total damage.

The data controller or data processor is exempted from liability if it can prove that it bears no responsibility whatsoever for the event causing the damage.

5.4. Right to judicial remedy:

You have the right to turn to a court and to request effective judicial remedy from the court, if, according to your opinion your rights under GDPR were violated as the result of the processing of your personal data performed in a manner not in compliance with the legal regulations.

The procedure against the Data Controller or data processor shall be initiated before a court of the member state according to the place of activity of the Data Controller or data processor. Such a procedure can be initiated before a court of the member state according to your usual place of residence as well, except if the data controller or data processor is a public authority of a member state acting under its public power.

VI. Data security:

The Data Controller obliges itself to employ adequate and efficient physical, IT, organizational and administrative measures to preserve confidential, intact and available condition of your personal data.

GREEN FOX ACADEMY Kft.
Data Controller