

## Privacy Notice

### 1. Purpose

- a. The purpose of this Privacy Policy/Notice is to set forth the data protection and data processing principles applied by **ProSelf Zártkörűen Működő Részvénytársaság** (H-1046 Budapest, Eötvös József u. 2/a.) ("**Data Controller**"), as well as the Data Controller's Privacy and Data Processing Policy.

### 2. Data Controller

**ProSelf Zártkörűen Működő Részvénytársaság** (H-1046 Budapest, Eötvös József u. 2/a.)

### 3. Personal data required for the completion of the questionnaire

The personal data processed under the Solaris program:

- first name
- last name
- e-mail address/user name
- year of birth
- employer
- organisational unit

### 4. Legal basis, purpose, method and duration of the data processing

- a. Pursuant to the provisions of Act CXII of 2011 on the Freedom of information ("**Info tv**"), the legal basis of the data processing is the consent given by the user ("**User/Data Subject**") of the Solaris software found on the [www.proself.org](http://www.proself.org) website ("ProSelf Application") (*section 5(1), point a) of Info tv*).
- b. The data will be processed for specified and explicit purposes, based on which the Data Controller is entitled to store, process, analyse, use for statistical purposes, and anonymise, if needed, the personal data, within the scope of using the ProSelf Application, i.e. for the purposes of measuring employee satisfaction and performance, and the related coaching services, with that once the data is anonymised, it is no longer deemed to be a personal data. The Data Controller shall only be entitled to use the Data Subject's personal data for any purposes other than the above described purposes, subject to the Data Subject's explicit consent provided to the data being used for such other purposes. This shall not apply to cases when the Data Controller is obliged to disclose the User's data to official authorities by law (e.g. *when being obliged by a court*).
- c. User shall be responsible for the data supplied being true and correct.
- d. The duration of data processing shall end upon the data being anonymised, or if no anonymisation takes place, upon the consent being revoked.

- e. User shall be entitled to request the Data Controller to block or delete the User's personal data recorded. Such request may be sent to the Data Controller to the following e-mail address: [attila.kelemen@proself.org](mailto:attila.kelemen@proself.org), or via registered mail to the following address: H-1046 Budapest, Eötvös József u. 2/a. The Data Controller shall make the necessary arrangements to block the relevant data within 48 hours upon the receipt of such request. The Data Controller shall make arrangements for the deletion of personal data within 48 hours upon receipt of the relevant request.
- f. When the retention of certain data is mandatory by law, the duration of data processing is not applicable (e.g. *accounting laws*), and the User shall not be entitled to request a deletion of such data.
- g. The [www.proself.org](http://www.proself.org) website operated by the Data Controller will place and read out small data packets, i.e. cookies, on the User's computer, for the purposes of providing services tailored to individual needs. When the browser returns a previously saved cookie, i.e. data packet, the Data Controller processing the cookie may link the User's current visit to the User's past visits, but solely in relation to the Data Controller's own data content.

## 5. Provisions governing data transfer and data processing

- a. The Data Controller's work staff and authorised representative(s) are entitled to get access to the Data Subject's personal data.
- b. The Data Controller uses third parties for the provision of the services defined in section 4 b) above, in the capacity of Data Processors, and the Data Controller authorises the data to be transferred to such third party Data Processors. The Data Controller will transfer the User's personal data to the following **Data Processors**:
  - the web hosting company, which is Hrenkó Kft. at the time of issuing this Privacy Notice
  - the subcontractors of ProSelf, who are not entitled to make any meaningful decisions in relation to data processing, who shall only be entitled to process the personal data obtained solely in line with the Data Controller's instructions, who shall not be entitled to perform data processing operations for their own purposes, and who shall store and retain the personal data in line with the Data Controller's instructions.

## 6. The Data Controller's data security related tasks

- a. During its data processing operations, the Data Controller shall be obliged to ensure data security, and to take all necessary technical measures required to ensure the security of the data recorded, stored and processed, and further, the Data Controller shall make all efforts necessary to prevent the destruction, unauthorised use or unauthorised change of such data.
- b. In order to protect the Users' personal data, the Data Controller uses a firewall on its IT system, to protect the Winchester on which such data is stored.

## 7. Other data processing

- a. The Data Controller shall provide information on any data processing operations carried out, but not listed herein, when recording the data. Any court, prosecutor, or the investigative authorities, misdemeanour authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information, or other official bodies authorised by law are entitled to contact the Data Controller and request the Data Controller to supply information, disclose or transfer data, or supply documents. The Data Controller will only disclose personal data to the extent absolutely necessary for the achievement of the goals of such official request.

## 8. The Data Controller's contact details:

### **ProSelf International Zártkörűen Működő Részvénytársaság**

Registered seat: H-1046 Budapest, Eötvös József u. 2/a.

Company registration number: 01-10-048951

E-mail: [support@proself.org](mailto:support@proself.org)

## 9. Legal remedies available

- a. The User is entitled to request information about the processing of his/her personal data, and to request a correction of his/her personal data supplied, or to request a deletion of his/her personal data in the manner specified above – except for mandatory data processing operations (e.g. data processed pursuant to the provisions of the Accounting Act) – by sending a request to the Data Controller's contact address indicated above.
- b. Upon the User's explicit request, the Data Controller will provide information (via e-mail) about the User's personal data being processed by the Data Controller, as well as about the purposes, legal basis and duration of such data processing, and in case of the data being transferred to third parties, about the legal basis and the name of the recipient of such data transfer. The Data Controller shall provide information in writing within 25 days upon the submission of the related request.
- c. Legal remedy is available, and complaints can be submitted to the National Authority for Data Protection and Freedom of Information:

**Name: National Authority for Data Protection and Freedom of Information**

Registered seat: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Pf. 5.

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Website: [www.naih.hu](http://www.naih.hu)

- d. Complaints or requests relating to the data processing operations may also be submitted by the Users to the relevant court having jurisdiction.
- e. The Data Controller retains the right to unilaterally amend this Privacy Notice with the Users' prior notification. Upon such amendment entering into force, the User implicitly accepts the provisions of the amended Privacy Notice by using the services.
- f. All other matters relating to the processing of personal data shall be governed by the provisions of Act CXII of 2011 on the Right of informational self-determination and on the freedom of information ("**Info tv**").