

In the case of this data processing information sheet ÉMI Nonprofit Kft. is considered the data controller (headquarters: H-2000 Szentendre, Dózsa György út 26., Company registration number: 13-09-176128, e-mail address: [info@emi.hu](mailto:info@emi.hu), website: [www.emi.hu](http://www.emi.hu) ).

**Terms:**

PERSONAL DATA: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

DATA CONTROLLER: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law; ÉMI, as a legal organization is considered a data controller.

DATA PROCESSING: Any activity performed with the data regardless of the applied method is considered data processing. Such is the collection, recording, capture, systemization, storage, changing, use, query, forwarding, publication, coordination or linking, blocking, erasure and destruction of data, and the prevention of the data's further use, making photographs, audio or video recordings, and the recording of physical characteristics that make the identification of a person possible (finger or palm prints, DNA-samples, iris image, etc.).

DATA PROCESSOR: the natural or legal person, public authority, agency, or any other institution that handles personal data in the name of the data controller.

DATA CONTROLLER PERSON: The employee of the Company, or natural person in contract or other relationship with the Company that performs data processing involving personal data.

**Regulation:**

Data processed with relation to the purposes determined by the Data Controller in this information sheet contain personal data.

The Data Controller and the Data Processor determine eligibility levels to manage access to data, the employees of the Data Controller and Data Processor will have access based on these levels.

Concerning your personal data with regards to your contract with ÉMI Nonprofit Zrt. acting as Data Processor will be:

Postal services provided by: Magyar Posta Zrt. [Hungarian Post Service] (headquarters: H-1138 Budapest, Dunavirág utca 2-6.; company registration number: 01-10-042463, website: [www.posta.hu](http://www.posta.hu)).

**Legal basis of data processing:**

primarily (b) of Paragraph (1) of Article 6 of Regulation 2016/679 of the European Parliament and of the Council ("GDPR").

**Purpose of data processing:**

The Data Controller has not implemented or does not operate a decision-making process based on automated data processing, does not apply profiling.

Purposes of data processing and the time period of storing personal data can be found in the following table.

Name and purpose of data processing	Legal basis of data processing	Range of data processed	Time period of data processing	Access
Data processing required by law, data processing regarding the performance or modification of a contract, billing and communication related to a	Section (1) (b) of Article 6 of the GDPR	The name of the person representing the party, the name, phone number, e-mail address of the contact person, related to the conclusion or performance of contracts.	8 years after the termination of the contract	Authorized employees of ÉMI Nonprofit Kft.
The handling or recovery of accounts receivables in connection with commercial contracts	Data processing by law, Paragraph 6:22 of the Civil Code, Section (1) (b) of Article 6 of the GDPR	The name of the person representing the party, the name, phone number, e-mail address of the contact person, related to the conclusion or performance of contracts.	2, sometimes 5 years according to the limitation period	Authorized employees of ÉMI Nonprofit Kft.
Operation of an internal audit system	Data processing by law, the legitimate interests of the data controller Section (1) (b) of Article 6 of the GDPR	The name of the person representing the party, the name, phone number, e-mail address of the contact person, related to the conclusion or performance of contracts.	5 years following the date of the report concluding the audit	Authorized employees to perform internal audit
For the performance of an adult education contract	Data processing by law, the legitimate interests of the data controller	Personal data recorded in the adult education contract	8 years after the termination of the contract	Authorized employees of ÉMI Nonprofit Kft.

Data security: the Data Controller maintains regulations on the freedom of information in order to protect the personal data of data subjects, describing the methods and requirements of basic principles of data security, and the rules on accessing information.

The Data Controller protects its IT systems with a firewall to ensure their safety. The Data Controller uses an antivirus program to prevent the loss of data.

The Data Processing regulations describe the managing of data breaches.

Rights of the data subjects related to data processing:

The data subjects can request the following from the Data Controller:

- information on the processing of their personal data;
- the correction of their personal data;
- the deletion or limitation of their personal data (except for compulsory data processing);
- in certain cases they have the right to data portability; and
- can object the processing of their personal data.

The data subject can initiate an investigation by the National Data Protection and Freedom of Information Authority (<http://naih.hu>; H-1530 Budapest, Pf.: 5.; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) by referring to an impairment of rights that has happened or the danger thereof that might occur. In case of the violation of their rights, the data subject can contact the court of law.

**Publication and modifications:**

This data processing information sheet is available on the [www.emi.hu/adatvedelem](http://www.emi.hu/adatvedelem) webpage. The Data Controller reserves the right to unilaterally modify this information sheet in a future. Data Subjects will be notified by the Data Controller on their website.

Effective: 25 May 2018.