



HOSPITAL IN THE ROCK HISTORY ACADEMY

PRIVACY POLICY

The purpose of this Privacy Policy – hereinafter referred to as the “Policy” – is to present the legal order for the use of personal data kept by “The Rock” Museum Public Benefit Foundation (address: 1012 Budapest, Lovas út 4/C, tax number: 18728488-2-41) – hereinafter referred to as the “Foundation” in accordance with Hospital in the Rock History Academy LMS (therock.academy).

1. PURPOSE AND SCOPE OF THE POLICY

- *Ensures that the constitutional principles of data protection, the right of information self-determination, and the requirements of data security are enforced,*
- *Ensures that, within the framework of the legislation, everyone has control over their personal data, knows the circumstances under which it is processed, and prevents unauthorized access, alteration and unauthorized disclosure of the data,*
- *Provides information to the data subjects to demonstrate the Foundation’s data management practices.*

2. GOVERNING LEGISLATION

Regulation No 2016/679 of the European Parliament and of the Council (EU) of 27 April 2016 on the protection of natural persons with regard to the processing of their personal data and the free movement of such data and the repeal of Regulation No 95/46/EK (General Data Protection Regulation; hereinafter referred to as “GDPR”).

- *Act CXII of 2011 on the right to informational self-determination and freedom of information (hereinafter referred to as “Infotv.”)*
- *Act V of 2013 on the Civil Code (hereinafter referred to as “Ptk.”)*
- *Act CXXX of 2016 on the Code of Civil Proceedings (hereinafter referred to as “Pp”)*
- *Act CVIII of 2001 on certain aspects of e-commerce services and information society services (hereinafter referred to as “Eker.tv.”)*
- *Act XLVIII of 2008 on the basic conditions and certain limitations of economic advertising (hereinafter referred to as “Grt.”)*
- *Act CXIX of 1995 on the management of name and address data for research and direct business acquisition*
- *Act LXXVII of 2013 on adult education (hereinafter referred to as “Fktv.”)*
- *Decree No 393/2013 (XI. 12.) on detailed rules for the authorization procedure and set of requirements necessary for the conduct of adult education activities,*



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keeping records of adult education institutions and control of adult education institutions

- *Decree No 45/1014 (II.26) on detailed rules for contracts between the consumer and the undertaking*
- *LXXVI Copyright Act of 1999 (hereinafter referred to as “Sztj.”)*
- *Decree 11/2020 (II.7) on the implementation of the Adult Education Act*
- *Act LXXX of 2019 on Vocational Training*

3. THE DATA CONTROLLER

- *Name: “The Rock” Museum Public Benefit Foundation*
- *Address: Hungary, 1012 Budapest, Lovas street 4/C*
- *E-mail: info@therock.academy*
- *Phone: +36 707 010101*

4. THE RANGE OF DATA PROCESSORS

The data processor may process the personal data of the data subject only for the purpose specified by the Foundation and fixed in the contract, and in accordance with the instructions of the Foundation, it has no independent decision-making right with regard to data management. The data processor has undertaken a duty of confidentiality and contractual guarantees regarding the retention of personal data obtained in the performance of its duties.

Employees of the Foundation engaged in data management: the current president and secretary of the foundation, the museum director, as well as employees who perform supervisory, financial and administrative positions according to the job description.

External data processors of the Foundation in connection with the History Academy:

- *Name: Eurokontroll Kft.*
- *Address: Budapest, Mária tér 5, 1011*
- *Purpose of data management: accounting*
- *Name: Oxford One Zrt.*
- *Address: 1014 Budapest, Szentháromság utca 15.*
- *Purpose of data management: operation of OXIX LMS system*
- *Name: OTP Mobil Szolgáltató Kft.*
- *Address: 1143 Budapest, Hungária krt. 17-19.*
- *Purpose of data management: Operation of the Simplepay service*
- *Name: KBOSS.hu Kft.*
- *Address: 1031 Budapest, Záhony utca 7/C.*
- *The purpose of data management: operation of the szamlazz.hu service*



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- *Name: Microsec Zrt.*
- *Address: Budapest, Graphisoft Park Déli Terület, Ángel Sanz Briz út 13, 1033*
- *Purpose of data management: operation of e-sign service*
- *Name: Zoom Video Communications, Inc.*
- *Address: 6601 College Blvd, Overland Park, KS 66210, United Kingdom*
- *Purpose of data management: Operation of Zoom online video conferencing service (classroom, webinar)*
- *Name: Google LLC*
- *Address: 1600 Amphitheatre Pkwy, Mountain View, CA 94043, United Kingdom*
- *Purpose of data management: operation of Google meet video conferencing service (classroom, webinar)*
- *Name: The Rocket Science Group, LLC*
- *Address: 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA*
- *Purpose of data management: MailChimp newsletter service*
- *Name: DotRoll Kft.*
- *Address: Budapest, Fogarasi út 3-5, 1148*
- *Purpose of data management: hosting service*

5. SCOPE OF PERSONAL DATA PROCESSED, PURPOSE, DURATION AND TITLE OF DATA PROCESSING

The Foundation carries out the processing of data on the voluntary consent of the data subjects or on the basis of legal authorization.

Data-tellers shall provide all the information accurately and to the best of their knowledge. If the Data-teller does not provide his or her own personal data, it is the duty of the data-teller to obtain the consent of the data subject.

5.1. DATA MANAGEMENT

The data will be treated confidentially in accordance with legal requirements. In the contact details provided, we search for users in cases they have approved in order to optimize user satisfaction. Requests/notifications can be changed by the user in their profile information any time. Telephone conversation will not be recorded

5.2. DATA PROCESSING FOR EACH ACTIVITY OF THE DATA CONTROLLER:

5.2.1. Adult education activities

- *Legal basis for data processing: stakeholder consent, legal requirement*



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- *Scope of data processed: name, e-mail address, telephone number, contractual data (place and date of birth, mother's name, sex, nationality), billing details, billing information*
- *Purpose of data processing: digital contracting, provision of training, preparation of statutory training statistics and reports*
- *Data transfer: yes, according to legal regulations: Pest County Government Office, Education Office, Central Statistical Office*
- *Deadline for deletion of data: statutory period*
- *Possible consequence of the lack of communication: non-participation in training*

5.2.2. Other course organization and publishing activities

- *Legal basis for data processing: stakeholder consent*
- *Scope of data processed: name, e-mail address, telephone number, billing details.*
- *Purpose of data processing: participation in courses, providing access to curriculum*
- *Data transfer: none*
- *Deadline for deletion of data: until revocation*
- *Possible consequence of the lack of communication: non-participation in courses, no access to curriculums*

5.2.3. Direct marketing

In our newsletters and digital marketing methods we provide information on the trainings and programs of the Historical Academy.

- *Legal basis for data processing: consent of the Data Subject*
- *The range of the data processed: name, e-mail address*
- *Purpose of data management: to send digital material and offers by e-mail*
- *Data transfer: none*
- *Deadline for deletion of data: until revocation*
- *Possible consequence of the lack of communication: information transfer on the trainings and programs of the History Academy becomes impossible*

5.2.4. Contacting

- *Legal basis for data processing: legitimate interest*
- *The range of the data processed: name, e-mail address, date, attachment*
Purpose of data management: contacting
- *Data transfer: none*



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- *Deadline for deletion of data: 3 years*
- *Possible consequence of the lack of communication: impossibility of communication*

6. HOW DATA IS STORED AND PROVIDED

The Foundation shall keep the data processed by them at their place of business, both in paper and electronic form.

The Foundation uses an IT system to ensure that:

- *Data integrity can be justified (integrity)*
- *Ensure the authenticity of the data (authenticity)*
- *Data are accessible to right holders (availability)*
- *Data are protected from unauthorized access (confidentiality)*

The Foundation and any of its data processors always provide protection against fraud, espionage, viruses, burglaries, vandalism, natural disasters against their IT systems. The Foundation (or processor) applies server-level and application-level protection procedures.

Messages transmitted to the Foundation via the internet in any form are subject to network threats that lead to changes in information, unauthorized access or other illegal activity. In order to counter such threats, the Foundation shall do everything reasonably possible and be expected.

7. DISCLOSURE OF PERSONAL DATA

The Foundation informs the performers, lecturers, lecturers, contributors and other persons participating in the events of the events of the History Academy about the rules related to the handling of their personal data - their portraits - in the invitation sent to the event and / or in this Privacy Policy:

- *Duration of data processing: Until the data, subject's consent is withdrawn.*
- *Purpose of data management: promotion of adult education activities and educational goal.*
- *Legal basis for data processing: based on the voluntary consent of the data subject (Article 6 (1) (a) GDPR)*
- *Scope of data managed: The voice and facial image of the persons in the images and other personal data recorded by the images.*

8. COOKIES

Cookies are a small packet of data that internet services store in your browser. The therock.academy website uses cookies to optimize user experience. You can delete this from your computer or browser you are using any time. You can delete cookies



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from different browsers on the following pages: Google Chrome, Safari, Mozilla Firefox, Opera, Internet Explorer.

If you do not accept cookies, we cannot guarantee the proper functioning of the site. If you click on the “I accept” button, you agree to the use of cookies. This information is not personally identifiable.

9. EMBEDDED CONTENT FROM OTHER WEBSITES

Entries on therock.academy website may use embedded content from external sources (e.g. videos, images). Embedded content from external sources behaves exactly as if you have visited another website. These websites may collect information about visitors, use cookies or third-party tracking codes. Foundation is not responsible for the data and information protection rules and practices of these sites.

If we become aware that the external website violates applicable law, conducts harmful behaviour, we will remove the links from our site with immediate effect.

10. RIGHTS OF DATA SUBJECTS, REMEDIES

At any time, Data Subjects may request the Foundation information on how their personal data are processed, indicate their needs for deletion or modification, and withdraw their previously granted consent in writing form.

Data Subjects are not allowed to use their right of erasure in the case of data processing required by law.

- *Content of the right to information*
- *Content of the right of access*
- *Right to rectification*
- *Right to erasure*
- *Right to revocation*
- *Right to carry data*
- *Automated decision-making and profiling*

11. PROCEDURAL RULES

If the Foundation receives a request under Article 15-22 of the GDPR, the Controller shall inform the Data Subject in writing of the measures taken on the basis of the request as quickly as possible and at the latest within 30 days.

If the complexity of the application or other objective circumstances warrant, time limit may be extended once for a maximum of 60 days. The Foundation informs the Data Subject in writing of the extension of the deadline, together with the appropriate justification for the extension.

The Foundation shall provide the information free of charge, unless:



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- *The Data Subject repeatedly asks for information/action on substantially unchanged content;*
- *The request is clearly unfounded;*
- *The request is exaggerated.*

If the applicant requests the transfer of the data on paper or on an electronic medium (CD or DVD), the Foundation shall provide a copy of the data free of charge in the requested manner (unless the platform chosen would be technically disproportionate). The Foundation charges 500Ft for each additional copy requested per page/CD-DVD.

The Foundation shall make his reply to the request in electronic form, unless:

- *The Data Subject expressly requests a different response and does not cause an excessively high additional expenditure to the Foundation;*
- *The Foundation does not know the electronic contact details of the Data Subject*

12. REMEDIES

If you notice anything objectionable to the processing, please contact us immediately at info@therock.academy.

If, in the opinion of the Data Subject, his or her rights have been infringed by the Foundation and/or the processors, he or she has the right to appeal to the competent court.

If the Data Subject wishes to complain about the processing, he or she may do so with the National Data Protection and Freedom of Informational Authority at the following contact details:

- *Address: 1055 Budapest, Frankel Leo u. 9-11.*
- *Phone: 06-1/391-1400*
- *E-mail: ugyfelszolgalat@naih.hu*
- *Website: www.naih.hu*

13. OFFICIAL COOPERATION

The Foundation, if they receive a formal request from the competent authorities, must provide the specified personal data on a mandatory basis.

The Foundation will only provide data that are strictly necessary to achieve the purpose indicated by the requesting authority.

Valid from 01.10. 2020. until withdrawal.