

## DATA MANAGEMENT POLICY AND INFORMATION

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### **Data management information for clients applying for the registration-based trainings of Sämling Solution Consulting Kft., on the personal data processed about them**

The Company undertakes that the data management in connection with its services complies with the provisions set out in this prospectus and the applicable legislation, and that the provisions of the data management policy and prospectus are in compliance with the applicable Hungarian and European legislation, including, in particular the provisions of 112th Act of 2011 on the Right to Information Self-Determination and Freedom of Information (hereinafter: Info tv.), 5th Act of 2013 on the Civil Code (hereinafter referred to as: The Civil Code) The rules of the General Data Protection Regulation 2016/679 of the European Union, as well as the data processing provisions, are taken into account. (hereinafter: and the provisions of 77th Act of 2013 on Adult Education and Government Decree 11/2020 (7th Feb.) on Adult Education.

## DATA SECURITY

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- The Company shall take all organisational and technical measures to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure, erasure or unauthorised access to personal data transmitted, stored or otherwise processed, taking into account any data security risks.
- The Company takes all reasonable measures to ensure the integrity of the data and the accurate, complete and up-to-date status of the personal data it manages and/or processes.

## DATA MANAGEMENT

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The Company processes the personal data of its clients on the basis of the performance of a contract, the fulfilment of a legal obligation or the consent of the data subjects.

### **Purpose of data processing**

a) on the one hand, to fulfil the Company's obligations under the contract with its clients and training participants, to ensure participation in the training, to provide participants with written materials related to the training, to provide access to the online measurement platform and to be available to answer questions related to the application of the acquired knowledge,

b) on the other hand, to comply with its legal obligations related to the contract concluded with the client or participant (in particular 77th Act on Adult Education Act I of 2013 and the obligation to provide information provided for in this Act, as well as the preparation and submission of accounting, tax and other returns, forms, declarations),

(c) thirdly, that the Company can prove its compliance with the contract in court, before a public authority or any other body responsible for settling disputes between the parties.

### **Who has access to the processed data?**

With regard to the recorded data, the controller is Sämpling Solution Consulting Kft. (registered office: 1026 Budapest, Volkmann Street 5., represented by: Attila Iván Münnich Managing Director, Registry Court: company registration number by the Commercial Court of the Metropolitan Court of Budapest: 01-09-907768, e-mail: info@samlingsolution.hu, telephone: +36 20 213 0336), managers and employees involved in this job and thus authorized to do so have access to personal data.

In the course of these activities, the Company does not transfer the data to other data controllers, except to public authorities, investigative authorities, law enforcement authorities, judicial authorities and accounting. The Company fulfils its obligation by law by referring to Section 15 (1) (4) of the 77th Act of 2013 on Adult Education, on the basis of which it provides data to the adult education data reporting body. The Company transmits to the Adult Education Data System the trainee's natural person identification data, e-mail address and highest educational qualification for statistical purposes. Pursuant to § 21 (4) of the aforementioned legislation, the Company is obliged to provide data for statistical purposes in accordance with the National Statistical Data Recording Program. In addition to the above, the Company is obliged to provide information to the National Tax and Customs Office.

The Company uses the services of Mrs. Bárdos Ágnes Orbán independent contractor, accountant as data processor for the recorded data. (registered office: 1145 BP, Újvilág str. 31-33., tax number: 67764475-1-42.). The data processor accesses the data of the participants and customers in order to comply with legal obligations related to the contract (in particular accounting, tax and other returns, forms, declarations) and does not use the data beyond the fulfilment of these obligations.

The Company and the data processors process the data only if and only for as long as one of the aforementioned purposes of data processing exists.

### **What personal data do we process?**

In order to carry out the training, the adult education institution processes the following data on the legal basis and/or the consent of the data subject:

- the natural identity data of the person taking part in the training\*; address or mailing address; electronic mailing address; telephone number; personal data relating to the legal relationship of the training, which are based on the educational and vocational education, language skills, enrolment in training, evaluation and qualification of his studies, acquired through the training relating to the name of the professional qualification or other competence, the place, date and result of the examination, and
- if it is part of the development, a report produced as a result of the online 360-degree survey.

\* natural identification data: surname and first name, surname and first name at birth, place of birth, date of birth, surname and first name of the mother.

The consent given to the processing of data can be withdrawn by the participant at any time. In such a case, except where the Company is legally obliged to process the personal data concerned, the Company shall no longer use the data concerned for the purpose for which consent was given and shall not send any requests, except for information related to the processing of the data.

The participant may request the deletion of the personal data processed or the restriction of their use if, in his opinion, the personal data are no longer necessary for the purpose for which they were collected or otherwise processed or, in his opinion, the personal data are being processed unlawfully.

The participant may request the restriction of data processing even if he disputes the accuracy of the personal data processed, in which case the restriction applies to the period of time that allows the controller to verify the accuracy of the personal data.

### **Personal data of participants in adult education programs, the duration of the obligation to store**

The Company participates in the agreements on adult education concluded between Sämpling Enterprise Development Kft. and another legal entity. Accordingly, it handles the data associated with them. The personal data of the contracting company's (company, other organisation) employees or authorised representatives, subcontractors or, in the case of open training, the contracting natural person, are processed for the performance of the contract. The Company obtains personal data from the employer (principal) or directly from the data subject.

**The duration of the processing of personal data of training participants, as defined in the Law on Adult Education, is the end of the eighth year from the conclusion of the adult education contract. If an online survey has been made, the results of the survey will be stored by the Company for one year after the survey or training. The customer contact details are processed by the Company until five years after the completion of the training or service.** More information on the processing of data for the purpose of fulfilling other tax and accounting obligations and its storage period can be found in the information sheet on the website.

### **Participants' attendance and certificate receipt sheets**

During the performance of a contract concluded between the Company and another legal entity or natural person (trainings, courses), the Company prepares attendance and, occasionally, certificate receipt forms. The purpose of the data processing is to certify the performance of the activity to the client and to the respective State Administration Body for Taxation and Adult Education and, in the case of the certificate receipt form, to certify the transfer of the certificates. The legal basis for data processing is the fulfilment of a legal obligation.

### **Profile data of legal persons or parties to contracts between a natural person and a legal person**

During the performance of certain contracts concluded between the Company and another legal entity (e.g. 360-degree evaluation), the Company processes the personal data of employees or authorized representatives, subcontractors of the contracting party (company, other organization). The Company may obtain the profile data directly from the data subject or, in the case of evaluation procedures, from external evaluators. The duration of the data processing is the termination of the purpose of data processing, i.e. 12 months after the performance of the contract, or the withdrawal of the consent of the data subject.

## **CONTACT ON THE COMPANY'S WEBSITE**

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The natural persons contacting us on the website can give their consent to the processing of their personal data by ticking the corresponding box.

The scope of personal data that can be processed: name (surname, first name), electronic contact information (e-mail address) and/or telephone number of the natural person.

Purpose of the processing of personal data:

1. Contact, by electronic ad telephone inquiry,
2. Information about the Company's products, services, contractual conditions, promotions.

The legal basis for data processing is the consent of the data subject. Recipients of personal data or categories of recipients: employees of the Company performing tasks related to customer service and marketing activities, as data processors, employees of the Company's IT service provider performing hosting services. Duration of storage of personal data: until the request for quotation or the existence of the requested service or the withdrawal of the consent of the data subject (request for deletion), in the absence of this, for a maximum of 5 years.

## **ACCESS TO INFORMATION ABOUT PERSONAL DATA**

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On the basis of the right of access, the data subject may request information from the Company about which personal data is processed for what purpose, on what legal basis, for how long, as well as a copy of the personal data processed by the Company. In all cases, these requests for data are fulfilled free of charge by the Company for the first time, and in the event of an unfounded or excessive (for example, unreasonably repeated) access request, it reserves the right granted by law to refuse such a request or to establish a reimbursement corresponding to the costs incurred for the fulfilment of the request.

In order to protect your data, we can only grant you rights of access and availability on the basis of requests from the e-mail address you provide as contact details or following prior identification. If you have a request for this, please let us know at one of the following contact details:

- a) by e-mail: [info@samlingsolution.hu](mailto:info@samlingsolution.hu)  
b) by phone: +36 20 213 0336

We accept complaints about the lawfulness of data processing at the same contact details.

If you object to the Company's data processing, please contact Sämling Solution Consulting Ltd., so that we can remedy your complaint.

Registered office: Sämling Solution Consulting Ltd. 1026 Budapest, Volkmann Street 5th basement 2.

Postal address: 1026 Budapest, Volkmann Street 5th basement 2.

Email: [info@samlingsolution.hu](mailto:info@samlingsolution.hu)

Phone: +36 20 213 0336

In the event of unlawful processing of your personal data or infringement of your rights relating to your right to informational self-determination, you may seek remedy from the National Authority for Data Protection and Freedom of Information:

Registered office:

1055 Budapest, Falk Miksa Street 9-11.

Postal address: 1363 Budapest PO Box:9

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Phone: + 36 1 391-1400

In the event of a breach of his or her rights, the data subject may take legal action against the controller (at the defendant's place of establishment or the data subject's place of residence, according to the data subject's choice). The court will act in the case out of turn.

Date: Budapest, 11 April, 2025