

Privacy Policy

1. PURPOSE AND SCOPE OF THE DATA PROCESSING INFORMATION

1.1. The purpose of this Data Processing Notice is to set out the data protection and processing principles applied by **Égenföld Kft** (registered office: 8391 Sármellék, Dózsa György u. 202., company registration number: 20-09-079835; representative: Zsolt Varga, managing director acting independently; hereinafter referred to as the "**Company**" or "**Data Controller**") and the Company's data protection and management policy, which the Company, as data controller, recognizes as binding upon itself.

1.2. This Data Processing Notice contains the principles of processing personal data provided voluntarily by Users on the Website in order to use the products and services provided by the Company.

1.3. When drafting the provisions of the Data Processing Notice, the Company took particular account of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: "**General Data Protection Regulation**" or "**GDPR**"), Act CXII of 2011 on the right to self-determination in information and freedom of information (hereinafter: "**INFOTV.**"), Act V of 2013 on the Civil Code (hereinafter: "**PTK.**"), and Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activities (hereinafter: "**GRTV.**").

1.4. Unless otherwise specified, the scope of the Data Processing Notice does not extend to services and data processing related to promotions, prize games, services, and other campaigns of third parties other than the Data Controller that are advertised on the Website referred to below in this Data Processing Notice or appear on it in any other way, or to the content published by them. other campaigns, or content published by them.

1.5. Unless otherwise stated, the scope of the Data Processing Notice also does not extend to the services and data processing of websites and service providers linked to from the Website covered by the Data Processing Notice. Such services are governed by the provisions of the privacy policy of the third party operating the service, and the Data Controller accepts no responsibility for such data processing.

1. DEFINITIONS

2.1. "**Data processing**": any operation or set of operations performed on personal data or data files, whether automated or not, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.2. "**Data controller**": the person who, alone or jointly with others, determines the purposes and means of the processing of personal data.

2.3. "**Personal data**": any information relating to an identified or identifiable natural person ("data subject"); a natural person 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.

2.4. "**Data breach**" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

2.5. "**Data Processor**": a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the Data Controller. In the case of the services referred to in this Privacy Policy, Data Processors may be:

2.5.1. "**Website**": the website or press product operated by the Data Controller, <https://nlskeszulekek.hu> .

2.5.2. "**Service(s)**": the services operated and provided by the Data Controller, which are available through the Website.

2.5.3 "**Product(s)**": products distributed by the Data Controller, which are available on the Website.

2.5.4. "**User**": a natural person who registers for the Services and provides the data listed below in this context.

2.5.5. "**Data Processing Notice**": the Data Controller's present Data Processing Notice.

1. SCOPE OF PERSONAL DATA PROCESSED

3.1. When the User visits the Website, the Data Controller's system automatically records the User's IP address.

3.2. Based on the User's decision, the Data Controller may process the following data in connection with the use of the Services available on the Website, with regard to certain Services:

3.2.1. Registration:

- name
- e-mail address

3.2.2. Online purchase:

- courses and course modules purchased
- address

3.2.3. Newsletter subscription:

- name
- email address
- selected topic or topics

3.2.4. Complaint handling:

- name
- address
- other data voluntarily provided by the User

3.2.5. Contact:

If the User sends an email or letter by post to the Data Controller, the Data Controller will record the User's email address, if provided, their address, and other data voluntarily provided by the User, and will process it to the extent and for the duration necessary to provide the service.

3.2.6. Content editing:

In the course of its content editing activities, the Data Controller processes the data of all natural persons who have contributed to the production of the content, either as sources or by being referenced in the edited content. In this case, the personal data most frequently processed by the Data Controller may include: the name, position, workplace, age, and place of residence of the data subject, as well as other data indicating how the data subject is related to the topic of the edited content.

3.3. Regardless of the above, it may happen that a service provider technically related to the operation of the Services carries out data processing activities on the Website without informing the Data Controller. Such activities do not constitute Data Processing carried out by the Data Controller. The Data Controller shall do everything in its power to prevent and filter out such data processing.

1. ADDITIONAL DATA PROCESSED BY THE DATA CONTROLLER

4.1. In order to provide a customized service, the Data Controller may place a small data package (a so-called "cookie") on the User's computer. The purpose of the cookie is to ensure the highest possible quality of operation of the given page, to provide personalized

services, and to enhance the user experience. The User can delete cookies from their computer or set their browser to disable cookies. By disabling cookies, the User acknowledges that the website will not function fully without cookies.

4.2. When providing personalized services, the Data Controller processes the following Personal Data using cookies: demographic data (based on the data referred to above) and information about interests, habits, and preferences (based on browsing history).

4.3. Data recorded technically during the operation of the systems: data from the User's login computer that is generated during the use of the Service and recorded by the Data Controller's system as an automatic result of technical processes. The data recorded automatically is logged by the system automatically upon login or logout, without any separate statement or action by the User.

1. PURPOSE AND LEGAL BASIS OF DATA PROCESSING

5.1. The purpose of data processing carried out by the Data Controller:

5.1.1. Registration:

- to maintain contact with the User
- to provide services
- to prepare statistics and analyses
- to protect the rights of Users
- to enforce the legitimate interests of the Data Controller

5.1.2. Online shopping:

- to maintain contact with the User
- to provide services
- to prepare statistics and analyses
- to protect the rights of Users
- enforcement of the legitimate interests of the Data Controller

5.1.3. Newsletter subscription:

- online content provision
- maintaining contact with the User
- provision of services
- preparation of statistics and analyses
- direct marketing and marketing communications (e.g. newsletters, event notifications, etc.)
- Protection of Users' rights
- Enforcement of the Data Controller's legitimate interests

5.1.4. Contact:

- Maintaining contact with Users
- Provision of services
- Handling and managing individual user requests
- Preparation of statistics and analyses
- Protection of Users' rights
- Enforcement of the Data Controller's legitimate interests

5.1.5. Complaint handling:

- maintaining contact with Users
- providing services
- handling and managing individual user requests
- preparing statistics and analyses
- protecting the rights of Users
- enforcing the legitimate interests of the Data Controller

5.1.6. Content editing:

- online content provision
- provision of services
- protection of Users' rights
- enforcement of the Data Controller's legitimate interests

5.2. The Data Controller declares that it will not use the Personal Data provided for purposes other than those described in sub-sections 5.1.

5.2.1. Data processing is based on the Users' voluntary, informed consent, which includes the Users' express consent to the use of their Personal Data provided during the use of the Website and the Personal Data generated about them. In the case of data processing based on consent, the User is entitled to withdraw their consent at any time, which, however, does not affect the lawfulness of data processing prior to withdrawal.

5.2.2. When the User accesses the Website, the Data Controller records the User's IP address for the purpose of providing the Service, in view of the Data Controller's legitimate interest and for the lawful provision of the Service (e.g., to filter out illegal use or illegal content), without the User's separate consent.

5.2.3. The legal basis for Data Processing in the context of content provision is, in addition to the User's voluntary consent, in certain cases the guarantee of fundamental rights to information and freedom of expression, within the framework defined by law.

5.2.4. The User guarantees that, before providing or making available personal data about other natural persons (e.g., gifts) while using the Services, they have obtained the consent of the natural persons concerned in accordance with the relevant laws.

5.2.5. The User shall bear full responsibility for the user content provided by them. When providing their email address and the data provided during registration, Users also assume responsibility for ensuring that they are the only ones using the Service from the email address provided and with the data provided by them. In view of this responsibility, any liability arising from logins and/or use of the Service using a given email address and/or data shall be borne exclusively by the User who provided the email address or other data.

1. PRINCIPLES AND METHODS OF DATA PROCESSING

6.1. The Data Controller shall process Personal Data in accordance with the principles of good faith, fairness and transparency, as well as in accordance with the provisions of applicable laws and this Data Processing Notice.

6.2. The Data Controller shall use Personal Data that is essential for the use of the Services on the basis of the consent of the User concerned and exclusively for the specified purpose.

6.3. The Data Controller shall process Personal Data only for the purposes specified in this Data Processing Notice and in the relevant legislation. The scope of the Personal Data processed shall be proportionate to the purpose of the data processing and shall not exceed that purpose. In all cases where the Data Controller wishes to use Personal Data for a purpose other than the original purpose of data collection, it shall inform the User thereof and obtain his or her prior express consent, or provide him or her with the opportunity to prohibit such use.

6.4. The Data Controller does not verify the Personal Data provided. The person providing the Personal Data is solely responsible for its accuracy, but the Data Controller shall take all reasonable measures to ensure that any Personal Data that is inaccurate for the purposes of data processing is deleted or corrected without delay.

6.5. The Data Controller shall not transfer the Personal Data it processes to third parties other than the Data Processors specified in this Data Processing Notice.

6.6. An exception to the provision set out in this section is the use of data in a statistically aggregated form, which may not contain any other data suitable for identifying the User concerned in any form, and therefore does not constitute Data Processing or data transfer.

6.7. The Data Controller shall notify the User concerned and all those to whom it has previously transferred the Personal Data for the purpose of Data Processing of any correction, restriction or deletion of the Personal Data it processes. The notification may be omitted if it does not prejudice the legitimate interests of the data subject in view of the purpose of the Data Processing.

6.8. The Data Controller shall ensure the security of Personal Data, take the technical and organizational measures and establish the procedural rules necessary to ensure that the data recorded, stored, or processed are protected and to prevent their accidental loss, unlawful destruction, unauthorized access, unauthorized use, unauthorized alteration, and unauthorized dissemination. In order to fulfill this obligation, the Data Controller shall call upon all third parties to whom it transfers Personal Data.

6.9. In view of the relevant provisions of the GDPR, the Data Controller is not obliged to appoint a data protection officer.

1. DURATION OF DATA PROCESSING

7.1. The Data Controller shall store automatically recorded IP addresses for a maximum of 30 days after their recording.

7.2. In the case of emails and letters sent by the User solely for the purpose of contacting the Data Controller or handling complaints, the Data Controller shall delete the email address or address indicated in the letter 90 days after the closure of the case referred to in the request, unless, in individual cases, the Data Controller's legitimate interest justifies the further processing of the Personal Data, until such time as the Data Controller's legitimate interest ceases to exist.

7.3. The processing of Personal Data provided by the User shall continue until the User deletes their account created during registration, unsubscribes from the Service, otherwise requests the deletion of Personal Data, withdraws their consent, or the Data Controller terminates the provision of the Service. In this case, the Personal Data will be deleted from the Data Controller's systems in a manner that cannot be retrieved.

7.4. The User's request to terminate Data Processing without deleting their registered account or unsubscribing from the Service does not affect their right to use the Service, but it is possible that they will not be able to use certain Services in the absence of Personal Data.

7.5. In the event of unlawful or misleading use of Personal Data, or in the event of a criminal offense or attack against the system committed by the User, the Data Controller shall be entitled to delete the User's Personal Data without delay, but in the event of suspicion of a criminal offense or civil liability, it shall be entitled to retain the Personal Data for the duration of the proceedings.

7.6. If a court or authority orders the deletion of Personal Data with legal force, the Data Controller shall carry out the deletion.

1. USER RIGHTS AND METHODS OF ENFORCEMENT

8.1. The User may request that the Data Controller inform them whether it processes their personal data and, if so, provide them with access to the Personal Data it processes, with particular regard to the following:

- the purposes of the Data Processing;
- the categories of Personal Data concerned;
- the categories of recipients to whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the User's right to request from the Data Controller the rectification, erasure or restriction of processing of personal data concerning him or her, and to object to the processing of such personal data;
- the right to lodge a complaint with a supervisory authority;
- if the data have not been collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved and the significance and the envisaged consequences of such processing for the data subject.

8.2. The User may request information about the processing of their Personal Data at any time in writing, by registered letter with acknowledgment of receipt sent to the Data Controller's address, or by email sent to info@mironglobal.hu.

8.3. The Data Controller shall consider the request for information sent by letter to be authentic if the User can be clearly identified on the basis of the request sent. The Data Controller shall only consider a request for information sent by email to be authentic if it is sent by the User from the email address provided.

8.4. The User may request the correction or modification of their Personal Data processed by the Data Controller.

8.5. Taking into account the purpose of Data Processing, the User may request the completion of incomplete Personal Data.

8.6. The Personal Data provided by the User in connection with the given Service may be modified by sending an email to the Data Controller's email address above, by clicking on the link at the end of each Newsletter, or by editing the account settings in the User's registered account. Once a request to modify Personal Data has been fulfilled, the previous (deleted) data cannot be restored.

8.7. The User may request the deletion of their Personal Data processed by the Data Controller. Deletion may be refused

- for the purpose of exercising the right to freedom of expression and information, or
- if the processing of Personal Data is authorized by law; and
- to the extent necessary for the establishment, exercise, or defense of legal claims.

8.8. The Data Controller shall in all cases inform the User of the refusal of the request for deletion, indicating the reason for the refusal. Once a request for the deletion of personal data has been fulfilled, the previous (deleted) data cannot be restored.

8.9. Newsletters sent by the Data Controller can be unsubscribed from via the unsubscribe link contained therein. Upon unsubscribing, the Data Controller shall delete the User's Personal Data from its newsletter database.

8.10. The User may request that the Data Controller restrict the processing of their Personal Data if

- the data subject disputes the accuracy of the personal data, in which case the restriction shall apply for a period enabling the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- the data subject has objected to the processing, in which case the restriction applies for the period until it is determined whether the legitimate grounds of the controller override those of the data subject.

8.11. The User may request, if available, that the Data Controller transfer the Personal Data provided by the User and processed by the Data Controller in an automated manner to the User in a structured, commonly used, machine-readable format and/or transfer it to another data controller.

8.12. The User may object to the processing of their Personal Data

- if the processing of Personal Data is necessary solely for the fulfillment of a legal obligation applicable to the Data Controller or for the enforcement of the legitimate interests of the Data Controller or a third party;
- if the purpose of the processing is direct marketing, public opinion polling, or scientific research; or
- if the processing is carried out in order to perform a task carried out in the public interest.

8.13. The Data Controller shall examine the lawfulness of the User's objection and, if it finds the objection to be well-founded, it shall terminate the Data Processing and block the Personal Data processed, and shall notify all those to whom the Personal Data affected by the objection had previously been transferred of the objection and the measures taken on the basis thereof.

8.14. If the Data Protection Incident is likely to pose a high risk to the rights and freedoms of Users, the Data Controller shall inform the User of the Data Protection Incident without undue delay. The User shall not be informed if any of the following conditions are met:

- the Data Controller has implemented appropriate technical and organizational protection measures, and these measures have been applied to the data affected by the Data Protection Incident, in particular measures such as encryption, which render the data unintelligible to persons not authorized to access the personal data;
- the Data Controller has taken further measures following the Data Breach to ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialize;
- the provision of information would involve a disproportionate effort. In such cases, the Data Controller shall inform the data subjects by means of publicly available information or take similar measures to ensure that the data subjects are informed in a similarly effective manner.

1. DATA PROCESSING

9.1. The Data Controller uses the Data Processors named above in this Data Processing Notice to perform its activities.

9.2. Data Processors do not make independent decisions; they are only entitled to act in accordance with the contract concluded with the Data Controller and the instructions received.

9.3. The Data Controller supervises the work of the Data Processors.

9.4. Data Processors are only entitled to engage additional data processors with the consent of the Data Controller.

9.5. By accepting this Data Processing Notice, the User expressly accepts and consents to the Data Controller transferring their Personal Data to the Data Processors.

1. POSSIBILITY OF DATA TRANSFER

10.1. Data transfer to the Data Processors specified in this Data Processing Notice may be carried out without the User's separate, ad hoc consent, as the User gives their express and unambiguous consent to such data transfer by accepting this Data Protection Notice. Unless otherwise provided by law, personal data may only be disclosed to third parties or authorities on the basis of an official decision or with the prior, express consent of the User.

10.2. The Data Controller is entitled and obliged to transfer all Personal Data at its disposal and stored by it in accordance with the rules to the competent authorities if it is obliged to do so by law or by a final official order. The Data Controller cannot be held liable for such data transfer and the consequences thereof.

10.3. The Data Controller shall keep a record of data transfers for the purpose of verifying the lawfulness of data transfers and ensuring that Users are informed.

1. AMENDMENTS TO THE DATA PROCESSING NOTICE

11.1. The Data Controller reserves the right to amend this Data Processing Notice at any time by unilateral decision.

11.2. The relevant laws and procedural practices change from time to time. If the Data Controller decides to update this Data Processing Notice, the amendments will be published on the Website. In the event of a significant change in the way the Data Controller processes the User's personal data, the Data Controller shall send a prior notification to the User and, if required by law, shall request the User's consent prior to implementing such changes. The Data Controller strongly recommends that the User read this Privacy Policy and keep themselves informed about the practices followed by the Data Controller. This Privacy Policy was amended on May 1, 2022.

1. LEGAL REMEDIES

12.1. Any questions or comments regarding data processing can be addressed to the Data Controller's staff at info@mironglobal.hu.

12.2. Users may submit complaints regarding data processing directly to the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; phone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu; website: www.naih.hu).

12.3. In the event of a violation of the User's rights, the User may turn to the courts. The adjudication of the lawsuit falls within the jurisdiction of the court. The lawsuit may also be brought before the court of the place of residence or domicile of the data subject, at the data subject's discretion. Upon request, the Data Controller shall inform the User of the possibilities and means of legal remedy.

Budapest, 13 September 2024.