

Privacy policy of FC-PANNON Tanácsadó Kft. for Metropolitan University students participating in the 7 habits assessment on their personal data processed

The following privacy policy aims to provide you with all the information regarding the processing and storage of your personal data in relation to the contract between Metropolitan University and FC-PANNON Tanácsadó Kft.

Your data shall be processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 17 April 2016 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 (General Data Protection Regulation) and Act CXII of 2011 on informational self-determination and freedom of information (Privacy Act).

1. What personal data do we manage?

We manage the following personal data:

- a) your name, university electronic mail address and Neptun code as contact details;
- a) the name of your program, level of your program (BA, MA, etc.), study language (English, Hungarian), study mode (full time or distance), name of institution, year of admission as statistical figures;
- b) your answers to the assessment and your report;
- c) letters and messages you sent to us in relation to the assessment and the implementation of the contract

2. Purpose of data management

FC-PANNON Tanácsadó Kft. handles personal data in order to fulfil its liabilities based on the contract with Metropolitan University. The purpose of personal data storage after you fill the assessment, is for you to be able to fill it again before you finish with your studies so that you can measure your personal improvement.

3. Legal basis of data management

GDPR Article 6 (1) a) and GDPR Article 6 (1) b)

4. Who is going to have access to your data?

The data manager of the data recorded is FC-PANNON Tanácsadó Kft. (registered seat: 1124 Budapest, Németvölgyi út 64., represented by: László Bölcsföldi managing director, registering court: Metropolitan Tribunal, company registration number: 01-09-163641, e-mail: office@franklincovey.hu, phone: 1/202-0448). The only persons having access to your personal data are the employees and managers of FC-PANNON Tanácsadó Kft. who are involved in the organization and undertaking of training programs.

In terms of data recorded on the 7 Habits assessment interface, FC-PANNON Tanácsadó Kft. shall use Propagent Kft. ((2840 Oroszlány, Bánki Donát utca 49.) as data processor.

Az FC-PANNON Tanácsadó Kft. shall not use any further data processors.

5. Data transfer between FC-PANNON Tanácsadó Kft. and Metropolitan University as contracting parties

FC-PANNON Tanácsadó Kft. transfers data to the Metropolitan University in CSV file format after each assessment period as follows:

- year of admission
- program name
- institution
- study mode
- study language
- study level

In the case of data transfer, the data transfer does not allow the identification of the data subject and non-personal data is transferred to the Metropolitan University. This means the identity of the student cannot be inferred directly or indirectly from the data. The data security requirements of Article 24 of the GDPR are guaranteed.

6. Data security

FC-PANNON Tanácsadó Kft. has implemented the appropriate technical and organizational measures taking the risks of varying probability and severity to the rights and freedom of natural persons to account in order to guarantee appropriate data security at all times for the personal data processed and stored.

FC-PANNON Tanácsadó Kft. does not use personal data for direct business acquisition purposes and does not transfer them to third parties for direct business acquisition purposes. FC-PANNON Tanácsadó Kft. does not use personal data for profiling purposes.

7. How long may we manage your data?

FC-PANNON Tanácsadó Kft. shall store your personal data for 3 years after the registration. FC-PANNON Tanácsadó Kft. deletes the processed personal data without undue delay at your request unless the further use of the personal data is necessary for the performance of the contract or the submission of legal claims. Such use is in particular the data transfer required for official, court proceedings.

8. Your rights

Based on the right of access, you may request information about your personal data stored and processed by FC-PANNON Tanácsadó Kft. including the purpose, legal basis and duration of the activity. You may also request a copy of your personal data stored and processed.

You have the right to request FC-PANNON Tanácsadó Kft. correct inaccurate personal data without undue delay.

You have the right to have your personal data deleted or to restrict the data management without undue delay by FC-PANNON Tanácsadó Kft. if the legal conditions exist.

9. How you can access the information related to your personal data

Your requests will be fulfilled free of charge for the first time in each case; however, in case of manifestly unfounded or excessive (for example: unreasonably repeated) requests for access we reserve the right to refuse such a request or to reimburse the costs incurred.

Your rights of provision and access can only be granted in case your inquiries arrive from the e-mail address you provided as your contact details or after prior identification. If you would like to exercise your rights, please let us know at one of the following contacts:

a) via e-mail: office@franklincovey.hu

b) via phone: 1/202-0448

We receive complaints about the lawfulness of data processing at the same contacts.

If you have an objection to the management of your data, please contact FC-PANNON Tanácsadó Kft. to resolve your complaint.

Head office: 1124 Budapest, Németvölgyi út 64.

Postal address: 1124 Budapest, Németvölgyi út 64.

E-mail: office@franklincovey.hu

Phone: +36 1 202-0448

Additionally, you may file action for unlawful processing of your personal data and violation of your rights to information self-determination to the Hungarian National Authority for Data Protection and Freedom of Information.

Headquarter: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf.: 9.

E-mail: ugyfelszolgalat@naih.hu

Phone: + 36 1 391-1400

In the event of a breach of your rights you may file action to court against the data manager (to either the headquarter of the defendant or to your place of residence). The court is acting out of turn in the case.