# <u>Data management related to the recording of personal data, the</u> <u>reconciliation of data, and the signing of an adult education contract on</u> <u>the basis of the Adult Education Act of those involved in adult education</u>

This includes all data management carried out on the basis of the Adult Education Act in connection with the recording and coordination of the data of the ones involved.

Goal	Legal basis	Those concerned	Data category	Time frame	Mode	Source
application, fulfillment of the legal obligation, recording the data of the participants in the training, identification of the persons involved, keeping in touch	Mandatory by law (Act LXXVII of 2013)	All natural persons who apply for adult training organized by the Data Controller participate in it	See details in the data management information / description	until the target is met, or for 8 years	electronically and / or on paper, manually	Those concerned

# What is the legal basis of data management?

- If the data controller carries out education and training on the basis of complies with the LXXVII., it carries out mandatory data management in connection with the personal data of the participants in the training organized by it.
- 2. Due to the fulfillment of the legal obligation, data management is mandatory according to the 2013 LXXVII. Section 21 of the Act in respect of those involved in adult education.

#### Who are the ones concerned?

3. All natural persons who apply for adult training organized by the data controller participate in it.

# What are the scope and purposes of the data processed during data management?

4. Scope of data involved in data management: the data subject involved in the training

1/5

- name, birth name, mother's name, place and date of birth, gender, citizenship, address of residence and stay, telephone number, e-mail address, education, labor market status,
  - the name, place of residence, telephone number of their parent, legal representative in accordance with Act LXXVII of 2013. in the case of a participant in training as described in Section 1 (1) (b) of the Act,
  - data related to the legal binding meant by the training in connection with the participant's
  - > education and professional qualifications, language skills,
  - admission to the training,
  - > evaluation and qualification of their studies,
  - > related to the name of the vocational qualification or other competence acquired through the training, the place, date and result of the examination,
  - the social security number of the participant,
  - the tax identification number of the participant
  - name of the cost bearer
  - (if different from applicant) invoicing
  - address of cost bearer invoicing
  - tax identification number of cost bearer invoicing
  - phone number of cost bearer keeping in touch
  - invoicing address
     to be used for invoicing, sending invoice
  - mode of pay\*
     to be used for payment
  - service ordered for ordering and invoicing
  - name\* and to be used for delivery
  - amount\*
  - order id\* for tracking
  - date of order\* to be used for invoicing and later in case of a complaint

#### What is the goal of data management?

5. The purpose of data management is application, fulfilling the legal obligation, recording the data of the participants in the training, identifying the persons involved and keeping in touch.

# How is data management carried out?

- 6. The activity and process involved in data management are as follows:
  - a. When applying for adult education, the person concerned fills in an application form by providing the above information, after receiving prior information. (see earlier)

- b. The participant is obliged to provide real data to the data controller based on 2013. LXXVII.
- c. Participant and data controller enter into contract with each other in accordance with the provisions of the law.
- d. By providing the data, the data subject acknowledges that the data controller uses the data for statistical purposes in order to fulfill their obligations arising from the said Act and may transmit them to the bodies specified in the Act.

# What is the time frame of data management?

- 7. The time frame of data management:
  - a. if, for some reason, the process does not continue beyond that of application, the goal cannot be achieved then the data controller deletes the data of the data subject.
  - b. otherwise, the LXXVII of 2013. pursuant to Section 16 of the Act for 8 years

# What is the mode of data management?

Mode of data management: electronically and / or on paper, manually

#### Where is the data from?

Source of data: immediately from the participant.

# Is there a disclosure to third parties?

Data communication: To the Adult Education Data Supply System specified by law. In case of inspection, it may be communicated to an authority, in case of a call for tenders to the tender inspection body.

#### Is there automated decision making and profiling?

8. Automated decision-making, profiling: this does not happen in data management.

#### **Others**

8. In connection with the data marked with \*, the Data Controller draws attention to the fact that if the data subject does not provide them to the Data Controller, the Data Controller shall refuse to provide the service (data management).

#### DATA SECURITY, STORAGE OF PERSONAL DATA, INFORMATION SECURITY

The data subject may exercise his / her rights (access, rectification, deletion, forgetting, restriction, protest, data portability, right to withdraw consent) by sending a request to the Data Controller, contacting the authority (www.naih.hu) and, if he / she considers that his / her rights have been violated, to the court having jurisdiction over the place of residence.

3/5

- 1. Personal data may only be processed for the purpose of the specific data processing.
- 2. The data controller ensures the security of the data. To this end, they shall take the necessary technical and organizational measures with regard to the files stored by means of IT.
- 3. The data controller shall ensure that the data security rules laid down in the relevant legislation are complied with.
- 4. It also ensures the security of the data, takes the technical and organizational measures and establishes the procedural rules necessary to enforce the applicable legislation, data and confidentiality rules.
- 5. The controller shall take appropriate measures to protect the data against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction and damage, or from it becoming inaccessible due to changes in the technology used.
- 6. The Data Controller may also ensure the enforcement of the data security rules by means of regulations, instructions and procedures separate from the present rules in terms of content and form.
- 7. The data controller is obliged to act in accordance with the procedure specified in the relevant legal regulations, these Regulations and other regulations related to data protection and others, ensuring the highest degree of data security.
- 8. In order to enforce the conditions of data security, the data controller shall ensure that the relevant employees are properly trained provided they employ an employee.
- 9. When defining and applying data security measures, the data controller shall take into account the state of the art and shall choose from several possible data management solutions which ensure a higher level of protection of personal data, unless this would be a disproportionate burden.
- 10. Within the scope of its tasks related to IT protection, the data controller shall in particular ensure:
- a. Measures to protect against unauthorized access, including software and hardware protection and physical protection (access protection, network protection);
- b. Measures to ensure the possibility of restoring data files, including regular backups and separate, secure management of copies (mirroring, backup);
- c. Protection of data files against viruses (virus protection);

- d. On the physical protection of data files and the devices carrying them, including protection against fire, water damage, lightning, other elemental damage, and the recoverability of damage resulting from such events (archiving, fire protection).
- 11. The data controller shall ensure the IT environment used for the management of personal data during the provision of the service in such a way that
- a. they connect the personal data provided by the data subject only and exclusively with the data and in the manner specified in these regulations.
- b. ensures that personal data are accessed only by employees of the data controller for whom it is necessary for the performance of their duties arising from their job duties.
- c. all changes to the data will be made with an indication of the date of the change.
- d. erroneous data will be deleted within 24 hours at the request of the data subject.
- e. the data is backed up.
- 12. The data controller provides the expected level of protection during the handling of the data in particular their storage, correction, deletion when requesting or protesting the relevant information.
- 13. Data shall be transferred with the consent of the data subject, without harm to his / her interests, in confidence, with the provision of a fully compliant IT system and in compliance with the purpose, legal basis and principles of data processing. The data controller shall not transfer the personal data of the data subject without his / her consent, nor shall he / she make them available to third parties, unless required by law.
- 14. Other unidentifiable data, which are not directly or indirectly related to him or her, hereinafter referred to as anonymous, shall not be considered personal data.