

## PRIVACY POLICY

regarding the data processing in connection to the website at <https://centraleuropeanacademy.hu/>

The operator of the above website, **Central European Academy** (registered office: H-1122 Budapest, Városmajor utca 12-14., registration number: Oktatási Hivatal FNYF/419-4/2023, tax ID number: 19359711-1-43, statistical ID number: 19359711-7220-599-01, hereafter referred to as: **Data controller**) hereby informs Users regarding the data processing conducted in relation to the website found at <https://centraleuropeanacademy.hu/> (hereafter referred to as: Website) and to the activities conducted by the Data controller pursuant to the regulations 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 (General Data Protection Regulation, hereafter as: **GDPR**), and with Act CXII of 2011 on the right to information self-determination and the freedom on information (hereinafter as: Infotv.)

The present Privacy Policy pertains to the processing of personal data provided by the User to the Data controller, moreover to any personal data that may be received by the Data controller via their online platforms or by way of “cookies”.

### **I. Terms and definitions**

For the purposes of the present Notice, the terms below shall mean the following:

- **Personal data:** any information relating to an identified or identifiable natural person (hereinafter referred to as: data subject); an identifiable person meaning one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person;
- **Data processing:** any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Data controller:** the natural or legal person, government body, agency or any other organisation, which determines the purposes and means of the data processing either solely or jointly with others; if the purposes and means of the data processing is regulated by EU or state laws, such EU or state laws may set out the data processor to be appointed, or may set out the specific aspects per which the data processor is to be appointed;
- **Data processor:** the natural or legal person, government body, agency or any other organisation, which processes personal data on behalf of the data controller;
- **Data erasure:** the complete physical destruction of the media containing the data;
- **Data forwarding:** the making available of the data to a given third party;
- **Data deletion:** rendering the data incomprehensible in a way that allows for no reinstatement thereof;
- **User:** the person visiting, browsing the Website and using the services thereon (Data subject);
- **Website:** the online portal operated by the Data controller (<https://centraleuropeanacademy.hu/>).

## **II. General provisions**

The Website and the websites connected thereto may be accessed by anyone – without having to hand over their personal data – and may freely gain information thereon without restriction.

Users may receive information regarding the activities of the Data controller on the Website and may subscribe to newsletter services of their own free volition by the fulfilling of a subscription form on the Website.

Users may also opt to contact Data controller via the designated contact form, available on the Website. By submitting the contact form, Users express their consent to the processing of their personal data per the provisions of this privacy policy.

Regarding any data processing that may occur on the Website, the Data controller shall be deemed as data controller. Regarding the provision of Services, the Data controller shall also be deemed as the data controller.

Users are solely liable for the data handed over to them and the contents the upload, for which Data controller expressly denies any liability.

Data controller is entitled to amend the present privacy policy unilaterally, at any time. Data controller issues the amendments of the present privacy policy by publishing them on the Website, in a separate menu item. Users are kindly requested to carefully consult the privacy policy upon any visit to the Website.

The present privacy policy is continuously available on the Website. Users may open, view, print or save the present privacy policy, but may not amend or alter it, this is the sole prerogative of the Data controller.

Data controller informs Users that the Website, and all graphical, text and other materials found thereon are copyrighted works protected under Act LXXVI of 1999 on Copyright, any use thereof, and any authorization of the use thereof are prohibited without the license of the Data controller. Users are not allowed to take any measures or to demean themselves in such a way which infringes or threatens the ownership, IP, or other rights of the Data controller, or through which the User obtains any intellectual property rights concerning the Website or its contents.

## **III. Categories of personal data processed by Data controller, the purpose, legal basis, mode and timeframe of processing**

### **The legal bases for data processing are the following:**

- a) GDPR Article 6 (1) a), where the processing is based on the informed consent of the data subject (hereafter referred to as: Consent);
- b) GDPR Article 6 (1) b), where processing is necessary for the performance of a contract to which the data subject is party (hereafter referred to as: Conclusion of Contract)

- c) GDPR Article 6 (1) c) where data processing is necessary for the fulfilment of or compliance with a legal obligation of the data controller (e.g. obligations with tax statutes – hereafter referred to as: Compliance)
- d) GDPR Article 6 (1) d), where processing is necessary in order to protect the vital interests of the data subject or of another natural person (hereafter referred to as: Vital Interest);
- e) GDPR Article 6 (1) e), where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (hereafter referred to as: Public Interest);
- f) GDPR Article 6 (1) f) where data processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, (hereinafter referred to as: Lawful Interest)

**1. Processing of automatically collected data regarding the Website**

<b>Data subject</b>	<b>Data category</b>	<b>Data source</b>	<b>Purpose of data processing</b>	<b>Legal basis of data processing</b>	<b>Timeframe of processing, time of deletion</b>
<b>User visiting the Website</b>	Country, type and version number of browser, device and operating system used, language settings	Data subject (User)	Statistical analysis, development of Website	GDPR Article 6 (1) f), necessary for the purposes of the legitimate interests pursued by the controller	1 year from time of visit
	Statistical data regarding Website visits	Data subject (User)	Statistical analysis, development of Website	GDPR Article 6 (1) f), necessary for the purposes of the legitimate interests pursued by the controller	1 year from time of visit

Data controller uses cookies and other various programs in order to ascertain the Website’s Users’ preferences regarding the Website, and to develop the Website based thereon. Data controller creates anonymous statistics of the Website visits for the purpose of developing the Website, of which no Users may be identified.

The above data processing is the lawful business interest of the Data controller since this serves to enable the Data controller to improve the Website and to make it more secure. The scope of the collected data is not significant, these are only collected and processed by the Data controller, with Data controller collecting no behavioural preferences, and conducting no automated decision making based thereon, with no personalised offer being sent by the Data controller to Users based thereon. Concordantly, this data processing does not affect User’s fundamental rights and freedoms adversely.

**2. Data processing regarding contact form submissions**

Users may elect to get into contact with Data controller directly, via a designated contact form made available on the Website. Data controller processes the following personal data in connection with the contact form submissions:

Data subject	Data category	Data source	Purpose of data processing	Legal basis of data processing	Timeframe of processing, time of deletion
<b>User filling out and submitting the form</b>	Name	Data subject (User)	Contact keeping Recognition of User	GDPR Article 6 (1) a): consent  GDPR Article 6 (1) f): legitimate interest	Until revocation of consent, but no more than 1 year from submission, with the exception of complaint messages.
	E-mail address	Data subject (User)	Contact keeping Recognition of User	GDPR Article 6 (1) a): consent  GDPR Article 6 (1) f): legitimate interest	Data processed regarding complaints are processed for the purpose of enforcement of claims and rights will be retained for a general limitation period of 5 years from the date of deletion of the Simple registration, provided that if civil, criminal, administrative or other official proceedings are initiated during this period, the data will be retained until the final conclusion of such proceedings.
	Telephone number <i>(not mandatory field)</i>	Data subject (User)	Contact keeping Recognition of User	GDPR Article 6 (1) a): consent  GDPR Article 6 (1) f): legitimate interest	

### **3. Data processing regarding direct marketing and newsletters**

We inform the Users that we send newsletters to persons having expressly subscribed to these newsletters. Users may subscribe to the newsletters on the Website by checking the appropriate checkbox and clicking the appropriate button.

Data subject	Data category	Data source	Purpose of data processing	Legal basis of data processing	Timeframe of processing, time of deletion
<b>Newsletter subscriber</b>	E-mail address	Data subject (User)	Sending of electronic direct marketing messages, newsletters	GDPR Article 6 (1) a): consent	Until revocation of consent

Subscribers to the newsletter may freely unsubscribe at any time by clicking the unsubscribe link found at the end of every newsletter. Data controller will send no further newsletters to any persons that have unsubscribed from them.

After having revoked consent, consent may be re-given at any time. Consent is not a prerequisite condition to the usage of any Service. E-mail address and name must be provided when giving consent, without which the giving of consent is not possible. Revocation of consent shall also require the provision of an e-mail address and name for the purposes of identification.

#### **IV. Data controller and data processors**

Regarding the data specified under point III, the data controller is the Data controller:

##### **Central European Academy**

Registered seat: 1122 Budapest, Városmajor utca 12-14.  
Registration number: Oktatási Hivatal FNYF/419-4/2023  
Tax ID number: 19359711-1-43  
Statistical ID number: 19359711-7220-599-01  
E-mail address: [academy@centraleuropeanacademy.hu](mailto:academy@centraleuropeanacademy.hu)

On behalf of the Data controller, the data of the User may be accessed by the employees of Data controller to the extent that is necessary for the carrying out of their tasks. Access rights to personal data are regulated in a strict internal policy.

##### **Data processors**

Data controller engages various enterprises for the processing and storing of User's data, with whom Data controller concludes data processing agreements. The following data processors conduct data processing regarding the User's data:

<b>Name and address of data processor</b>	<b>Purpose of data processing</b>	<b>Categories of processed data</b>
<b>Cloudflare, Inc.</b> (101 Townsend St, San Francisco, CA 94107)	Hosting services	Data specified under point III.

Regarding the USA-based data processors, we hereby inform data subjects in accordance with CJEU judgment no. [C-311/18.sz.](#) (Data Protection Commissioner vs. Facebook Ireland Ltd, és Maximillian Schrems) regarding the Privacy Shield framework:

- it cannot be guaranteed that the data processor in question meets GDPR requirements,
- it cannot be guaranteed that the data processor in question complies with GDPR standards,
- it cannot be guaranteed that the data processor maintains a level of security deemed adequate by GDPR,

- it cannot be guaranteed that the legal regulations governing the given company provide for adequate protection of personal freedoms,
- it cannot be guaranteed that an independent and effective authority is in place that supervises the data processing to the given company,
- it cannot be guaranteed that the country of the given company complies with their international law obligations on the protection of personal data,
- it cannot be guaranteed that data subjects are able to effectively and adequately exercise their privacy rights pursuant to the legal regulations that may apply in the country of the given company.

### **Data forwarding**

The Data controller is entitled and obligated to hand over personal data in their possession and lawful storage to the competent authorities where they are compelled to by applicable law or a final authority decision. For any such data forwarding, and for any consequences thereto, the Data controller may not be held liable. No other data forwarding is conducted by the Data controller.

### **Automated decision-making, profiling**

Data controller does not conduct automated decision-making or profiling regarding the data processed per the present Privacy Policy.

### **V. Data privacy directives observed by Data controller**

The Data controller respects the legally protected rights of their Users and of those who visit the online interfaces operated by them.

The personal data that is directly necessary for the usage of the services of the Data controller is processed by the Data controller per the consent of the data subjects, and strictly for the purposes pertaining thereto. The Data controller uses the personal data of the Users specified under point III hereto only per the means and purposes set out in the present Privacy Policy.

The Data controller as data controller undertakes to process the data in their possession per the provisions of the GDPR, of the Infotv. and other relevant legal regulations, and the regulations of the present Privacy Policy, and to refrain from making them available to any third parties not including those specified in the present Privacy Policy. The use of statistical compilations of data that do not contain the names or identifying data of Users in any way serve as an exception to the present point, as these do not constitute data processing, nor data forwarding.

The Data controller shall, in certain situations – e.g. official court or police inquiries, legal procedures regarding copyright, property or other disputes or the suspicion thereof concerning infringements upon the lawful interest of the Data controller, the endangerment of their provision of services, as well as per court or authority warrants –, as well as based on the User’s prior express consent, make User’s data available to third parties.

The Data controller shall make every reasonable effort to ensure that the processing and management of the Users’ data is given the protection set out by applicable law.

## **VI. Protection of personal data**

The Data controller complies with their obligations deriving from the applicable privacy regulations by:

- safely storing and deleting them;
- not collecting or storing excess amounts of data;
- protecting personal data from loss, violation, unauthorised access or publication, as well as ensuring that adequate technical measures are in place, protecting personal data.

The Data controller carries out adequate technical and organisational measures in order to protect the Users' personal data from accidental or unlawful destruction, loss or modification, as well as unlawful communication or access – especially where network communication thereof is a part of the processing –, and to protect data from any unlawful form of processing.

Accordingly, the Data controller enforces various levels of access rights over the data, which ensures that the data are only accessed by persons having adequate clearance, who are required to access the data in order to carry out their job or to fulfil their related obligations.

## **VII. Rights of the User**

Pursuant to the data protection legislation in place, the data subject is entitled to:

- a) request access to their personal data,
- b) request corrections regarding their personal data,
- c) request deletion of their personal data,
- d) request the restriction of their personal data,
- e) object to the processing of their personal data,
- f) request the porting of their personal data,
- g) revoke their consent regarding data processing
- h) file a complaint regarding any grievances.

### **a) Right of access**

The data subject is entitled to receive feedback from the data controller on whether their personal data is being processed or not, and if so, to request access to their personal data.

The data subject is entitled to request copies of their personal data being processed. For the purposes of identification, the data controller may request additional information from the subject, and – with the exception of the first copy being handed out – to charge any warranted administrative fees that further copies may entail.

**b) Right of correction**

The data subject is entitled to request any of their erroneous personal data to be rectified by the data controller. Based on the given data processing purpose, the data subject may be entitled to request incomplete personal data to be amended.

**c) Right of deletion („right to be forgotten“)**

The data subject is entitled to request the data controller to delete their personal data, and the data controller shall delete these. In any such case, the data controller will not be able to provide any further services to the User.

**d) Right of restriction**

The data subject is entitled to request the restriction of their personal data. In this case, the data controller shall mark the affected personal data, which shall only be processed for certain specific purposes.

**e) Right to objection**

The data subject is entitled to object at any time, for any reasons of their own, to the processing of their personal data per Article 6 (1) e) or f) of the general data protection regulation, including the profiling based on said regulations, and to request that the data controller no longer process their personal data.

Moreover, where the User's data is processed by the Data controller per lawful interest, User is entitled to object to their data being processed per this basis.

Additionally, User is entitled to request human intervention in specific cases of automated decision making. We inform Users that data controller employs no automated decision-making mechanisms.

**f) Right to data portability**

The data subject is entitled to request that their given personal data be provided to them in an articulated, widely recognised, computer readable format (i.e. digital format) from the data processor, and is entitled moreover – where technically possible – to request these data to be forwarded to another data controller without the Data controller hindering this.

**g) Right to revoke consent**

Where the processing of User's personal data is conducted per their consent, User may revoke their consent at any time via the link found in newsletters, or by changing their website-profile or mobile device settings. Revocation of consent does not affect the legality of consent-based data processing conducted prior to the revocation of consent.

If User revokes their consent given to the Data controller, the services provided by the Data controller may partially or wholly be unavailable to be provided.

**h) Right to file a complaint with the supervisory authority**

If the User believes that their personal data have been infringed upon, they may file a complaint with the local data privacy supervisory authority, primarily per their residence, their place of work or in the member state where the purported breach had taken place.

In Hungary, they may also turn to the National Authority for Data Protection and Freedom of Information: H-1055, Hungary, Budapest, Falk Miksa utca 9-11.; telephone: +36-1 391-1400; telefax: +36-1 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

### **VIII. Contact keeping**

Should the User wish to exercise their data privacy rights or to lodge a complaint, they may contact the Data controller's appointed colleague via an e-mail sent to the e-mail address below. Moreover, User may seek out the Data controller by way of mail sent to the postal address below.

E-mail: [academy@centraleuropeanacademy.hu](mailto:academy@centraleuropeanacademy.hu)

Postal address: Central European Academy, 1539 Budapest, Pf. 561.

### **IX. Miscellaneous provisions**

In case of any data privacy incidents, the Data controller shall notify the supervising authority per the applicable legal regulations, within 72 hours from having gained knowledge of the incident; and shall keep records thereof. The Data controller shall notify Users thereof in cases specified by law.

The data processor shall regularly check their online platforms and the information published thereon and shall make every reasonable effort to ensure the information thereon are current and factual. However, User may find information on these online platforms that are out of date. The Data controller accepts no material liability for this information.

Visitors of the Data controller's online platforms and Users may visit other websites from the Data controller's online platforms that are not operated by the Data controller. The Data controller accepts no liability regarding the correctness of data found thereon, the contents of these pages, and for the security of any data provided there by visitors of the Data controller's online platforms and Users. Thus, when using these websites, please take special care in consulting the privacy policies of the respective operating companies found thereon.

The present Privacy Policy shall enter into force on the 31 of May 2023.

Dated.: 31 May 2023.

Dr. Heinerné Dr. Barzó Tímea Tünde (signed)  
General-Director