PRIVACY POLICY

regarding the data processing in connection to personal data of contractual partners and liaisons or companions

The **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 data subjects regarding the data processing conducted in relation to personal data of contractual partners of Data controller as well as their liaisons, 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**.)

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 reinstation 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

Data controller informs the data subjects who are the contractual partners of Data controller, as well as the liaisons of said contractual partners on how, why, by what legal grounds and for what timeframes their personal data are being processed, and what rights and freedoms data subjects are provided regarding the processing of their personal data.

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, and by making it available at their offices found at the address above. 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.

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 statues – 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)

Personal data processed:

A) <u>Personal data processed regarding persons involved as speaker, moderators or other collaborators</u>

Data subject	Data category	Purpose of data processing	Legal basis of data processing	Timeframe of data processing
Collaborator of event	name	Creation of contract Conclusion of contract Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	e-mail address	Creation of contract Conclusion of contract Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	telephone number	Creation of contract Conclusion of contract Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	bank account number	Creation of contract Conclusion of contract Enforcement of rights and claims	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	image, audio, video recording	Conclusion of contract Promotion of event	GDPR Article 6 (1) a): consent *In case of public figures*: GDPR Article 6 (1) f): lawful interest	Revocation of consent
	career data, CV data	Informing of audience Promotion of event	GDPR Article 6 (1) a): consent *In case of public figures*:	Revocation of consent

			GDPR Article 6 (1) f): lawful interest	
	dietary preferences	Provision of catering to Collaborator	GDPR Article 6 (1) a): consent In case of data pertaining to health and religious practice: GDPR Article 9 (2) a): express consent of data subject to specific data processing purpose	Conclusion of contract
	data contained on lodging booking data sheet (*In case of booking by Data controller*)	Provision of lodging	GDPR Article 6 (1) a): consent	Conclusion of contract
	data contained on travel ticket booking data sheet (*In case of booking by Data controller*)	Provision of catering	GDPR Article 6 (1) a): consent	Conclusion of contract
	data contained in vehicle registration (*In case of vehicular transporting financed by Data controller*)	Provision of vehicular travel remuneration	GDPR Article 6 (1) a): consent	Conclusion of contract

In case of revocation of consent, Data controller shall delete all of the personal data of the data subject nominated above. The obligation to deletion encompasses data stored both electronically and on paper.

The name, e-mail address and telephone number of the data subject are processed by Data controller pursuant to lawful interest. It is the shared lawful interest of Data controller and the contractual partner for the above personal data to be processed, since it is necessary to fulfil the contract made between the Data controller and the contractual partner, for keeping contact necessary to the fulfilment of the contract, and to provide notices pertaining to the fulfilment of the

contract. Only the necessary data of the contractual partner or their liaison are processed, thus, the rights and freedoms of the contractual partner or their liaison are not infringed upon, and thus do not supersede the lawful interests of Data controller and their contractual partner as described above.

In case of public figures, the processed personal data are publicly available due to the public activities of said public figures, thus, the data processing conducted by Data controller as per the above do not infringe upon the rights and freedoms of the data subjects, and do not supersede the lawful interests of Data controller and their contractual partner as described above.

B) <u>Personal data of persons accompanying collaborators or travelling with them, regarding whom Data controller organises travel or lodging services</u>

Regarding the data subjects who are accompanying collaborators per point III. A) above, or those who are travelling companions of said collaborators, regarding whom Data controller provides travel or lodging organisation services per the express request of said persons, Data controller processes the following personal data.

Data subject	Data category	Purpose of data processing	Legal basis of data processing	Timeframe of data processing
Persons accompanying collaborators or travelling with them, regarding whom Data controller organises travel or lodging services	name	Creation of contract Conclusion of contract Identification Contact keeping	GDPR Article 6 (1) a): consent	Until conclusion of contract
	e-mail address	Creation of contract Conclusion of contract Identification Contact keeping	GDPR Article 6 (1) a): consent	Until conclusion of contract
	telephone number	Creation of contract Conclusion of contract Contact keeping	GDPR Article 6 (1) a): consent	Until conclusion of contract
	dietary preferences	Creation of contract Conclusion of contract Provision of catering	GDPR Article 6 (1) a): consent In case of data pertaining to health and religious practice: GDPR Article 9 (2) a): express consent of data	Until conclusion of contract

			subject to specific data processing purpose	
	data contained on lodging booking data sheet	Creation of contract Conclusion of contract Provision of lodging	GDPR Article 6 (1) a): consent	Until conclusion of contract
	data contained on travel ticket booking data sheet	Creation of contract Conclusion of contract Provision of catering	GDPR Article 6 (1) a): consent	Until conclusion of contract
	data contained in vehicle registration (*In case of vehicular transporting financed by Data controller*)	Creation of contract Conclusion of contract Provision of vehicular travel remuneration	GDPR Article 6 (1) a): consent	Until conclusion of contract

Data subjects may revoke their consent freely at any time by way of an e-mail message sent to Data processor, where the provision of their name and e-mail address is necessary for Data controller to ascertain which data subjects' data are to be deleted.

In case of revocation of consent, Data controller shall delete all of the personal data of the data subject nominated above. The obligation to deletion encompasses data stored both electronically and on paper.

C) <u>Personal data of persons collaborating in publications or scientific research</u>

Data subject	Data category	Purpose of data processing	Legal basis of data processing	Timeframe of data processing
	name	Creation of contract Conclusion of contract Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	e-mail address	Creation of contract Conclusion of contract Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract

Data subject collaborating in publications or scientific research	telephone number	Creation of contract Conclusion of contract Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	career data, CV data	Creation of contract Conclusion of contract Enforcement of rights and claims	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	bank account number	Creation of contract Conclusion of contract Enforcement of rights and claims	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	billing/accounting information	Creation of contract Conclusion of contract Enforcement of rights and claims	GDPR Article 6 (1) a): consent *In case of public figures*: GDPR Article 6 (1) f): lawful interest	Revocation of consent

The name, e-mail address and telephone number of the data subject are processed by Data controller pursuant to lawful interest. It is the shared lawful interest of Data controller and the contractual partner for the above personal data to be processed, since it is necessary to fulfil the contract made between the Data controller and the contractual partner, for keeping contact necessary to the fulfilment of the contract, and to provide notices pertaining to the fulfilment of the contract. Only the necessary data of the contractual partner or their liaison are processed, thus, the rights and freedoms of the contractual partner or their liaison are not infringed upon, and thus do not supersede the lawful interests of Data controller and their contractual partner as described above.

D) <u>Personal data of tenderers and their liaisons</u>

Data controller conducts the following data processing regarding tenderers' liaisons submitting a tender offer to the Data controller, but not establishing a contractual relationship with Data controller for lack of a winning offer.

Data subject	Data category	Purpose of data processing	Legal basis of data processing	Timeframe of data processing
Liaisons of tenderers	name	Processing and ruling on tender Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract

	e-mail address	Processing and ruling on tender Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	telephone number	Processing and ruling on tender Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract
	represented company	Processing and ruling on tender Enforcement of rights and claims Identification Contact keeping	GDPR Article 6 (1) f): lawful interest	5 years from termination of contract

It is the shared lawful interest of Data controller and the tenderer for the above personal data to be processed, since it is necessary for the provision of notices between the Data controller and the tenderer regarding the procurement procedure, moreover, Data controller is legally obliged to keep tender records pursuant to the regulations governing procurement procedures. Only the necessary data of the liaisons are processed, thus, the rights and freedoms of the contractual partner or their liaison are not infringed upon, and thus do not supersede the lawful interests of Data controller and their contractual partner as described above

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

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 no data processors in the scope of the data processing described herein.

Data forwarding

Data controller informs data subjects, who by the acceptance of this privacy policy acknowledge that the name and contact data per III. A) and B) are forwarded for scientific cooperation purposes to the following organizations: Mádl Ferenc Összehasonlító Jogi Intézet (MFI), Közép-európai Jog Szövetség (KÖSZ), and Magyar Összehasonlító Jogi Egyesület (MÖJE). These organizations are to be construed as independent data controllers, for whose data processing conduct, Data controller waives all liability.

Data controller informs data subjects moreover, who by the acceptance of this privacy policy acknowledge that the personal data collected and processed for the purposes of event organisation are – to the necessary extent and restricted to the necessary data categories – forwarded to the joint organisers of the given event, with Data controller informing data subjects beforehand of the exact joint organisers, as data forwarding recipients. These organizations are to be construed as independent data controllers, for whose data processing conduct, Data controller waives all liability.

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 form any unlawful form of processing.

Accordingly, the Data controller emplaces 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).

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
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