

INFORMATION NOTE ON THE MANAGEMENT OF PERSONAL INFORMATION

1. General information

ITL Group Kft. (head office: Budapest, Váci utca 81., IV. Floor), as the controller of personal information is committed to protecting the privacy of users and to compliance with the relevant regulations, under the currently effective legislation, in particular, Regulation no. 2016/679/EU of the European Parliament and of the Council, hereinafter referred to as: the GDPR.

The purpose of this information note (hereinafter referred to as: “Information note on the management of personal information”) is to inform the users of our services and / or our clients (hereinafter referred to as: the “user”) on the procedures for collecting, using and disseminating information that users provide to us through this website and through the applications provided to desktop computers and laptops (hereinafter referred to as: the “Platforms”) and / or when collecting data which we perform during the provision of services requested from us by the client.

This Information note on the management of personal information (together with the Rules and the Terms and Conditions or other documents referred to in this Information note and the Information note on cookies) defines the bases for processing personal information under the currently effective regulations, in particular Regulation no. 2016/679/EU of the European Parliament and of the Council (hereinafter referred to as: the GDPR) which is collected from the Clients or which are provided to us by the client. Please read the following information carefully to understand the aspects and procedures for handling your personal information and the ways of handling personal information.

This Information note on the management of personal information (if necessary, together with the Rules and the Terms and Conditions or other documents referred to in this Information note and the Information note on cookies) shall be applicable to data management in case of the already registered users and / or clients, from whom we have already received consent for the data management under the laws in force mentioned above.

2. What kind of information do we collect from the user and how long do we store these data?

(Personal data under Article 4, 5, 13 and 44 of the GDPR)

We are authorized to collect and manage the following data:

- First name and last name
- E-mail address

2.1. Information provided by the user: The user provides us with information containing also data necessary for the identification of the person (hereinafter referred to as: “Personal data”) when he or she uses our Platforms, or when filling in forms on the Platforms, when participating in one of our programs, promotions or surveys, when he or she contacts us by phone, e-mail or in any other way, when the user reports a problem to us concerning our Platforms and / or assigns us or requests a service from us.

Personal data may include the following:

- The information required to register the services offered on our Platforms or the information necessary to access other services provided by us, such as: name, e-mail address, date of birth, gender, mobile phone number and password. All these fields must be completed. ITL Group is not able to provide the services offered on its Platforms if it does not receive the requested information, and, as a consequence, the user cannot register their own user account on our Platforms or request to participate in the programs and trainings;
- Photo;
- Postal address;
- A brief Curriculum Vitae;
- The summary of correspondence conducted between the user and us;
- The visits of the user made on our platforms and the description of the sources the user logged into;
- Answers to the possible surveys or questionnaires, such as: reviews of events and trainings. We use these information for analyzes and to better understand users;
- Information on the position when the user has consented to collecting and managing the referenced data; passport, driving license, personal identity card and other similar document, the submission of which was agreed by the user.

2.2. Automatically collected data

2.2.1. If the user performs a subscription by using the authentication procedures on social media, ITL Group will have access to certain personal data (e.g. first name, last name, photo, e-mail, number of Facebook contacts, etc.) in the social media account of the user, on the basis of the terms of use applicable on these social media platforms. In addition to this, we may collect certain Personal data of the user when he or she communicates with third-party social media, for example, with a “Like” mark.

2.2.2. As concerns each visit made to our Platforms, under the applicable legislation and, if necessary, with the consent of the user, we may collect data on the equipment used and the networks the user enters while using our services. The following information belongs here: IP address, login information, the type and version of the search page, the type and version of the plug-ins of the search engine, operating system and platform, advertising ID, information about the visit, such as: URL “clickstream” to or from our platforms, the products displayed or searched, download errors, the duration of visits on specific pages, interactions on our websites and any phone number from which you called our BackOffice. We collect this information by using various technologies, including cookies (for more information, please read our Information note on cookies).

2.3. Retention of data

2.3.1. With the exception of the Personal data categories indicated in the below Article 2.3.2, we retain the Personal data during the relationship with us and under the regulations in force applicable to the retention of personal data.

2.3.2. The following Personal data categories must be retained for a different length of time:

- Financial data (e.g. payments, refunds, etc.) will be retained in accordance with the applicable tax laws and accounting legislation.

3. How do we use the information collected from the Client?

(Legality of handling personal data and consent to the management of personal data under Article 6 and 7 of GDPR)

Under Article 6 and 7 of the GDPR, the legitimate management of Personal data is carried out for the following purposes:

3.1. To fulfil our obligations arising out of the contracts made by and between the User and us, and to provide the requested information and services to the User; if the management of data is necessary for the fulfilment of the mutually undertaken contractual obligations.

3.2. To send information about the services by e-mail and / or text message and / or by any other communication device; if the management of data is necessary for the fulfilment of the mutually undertaken contractual obligations and / or if the data are handled with the consent of the user.

3.3. To allow access to our consulting services and to provide the Client the opportunity to talk to the ITL Group; if (i) the management of data is necessary for the fulfilment of the mutually undertaken contractual obligations, (ii) if the data are handled with the consent of the user and / or (iii) if it is required to ensure, exercise and protect the statutory rights.

3.4. To ensure compliance with (i) the applicable laws, (ii) the General Terms and Conditions of Use and (iii) the Information note on the management of personal information. This data management is necessary for (i) the fulfilment of the contractual obligations undertaken mutually and / or (ii) for the provision, exercise and protection of the rights provided for by the law.

3.5. Under the regulations in force and with the consent of the user, to send marketing materials and the necessary information to facilitate the provision of the requested services; to send proposals and instructions on the products and services related to our services which may be of the user's interest. In addition to this, we also use the data to control the user to make our ads appear on social media platforms. More detailed information on these functions and the data received from the user can be found on the associated areas of the social media platforms of third persons.

This data management is based on the consent of the user and / or our legitimate interests (i.e. to send targeted advertisements to the user).

3.6. To inform the user about any potential changes in our services. This data management is necessary for (i) the fulfilment of the contractual obligations undertaken mutually and / or (ii) for the provision, exercise and protection of the rights provided for by the law.

3.7. To make it possible for the users to participate in the interactive functions of our services, if they choose it. This data management is necessary for (i) the fulfilment of the contractual obligations undertaken mutually and / or (ii) the data is handled with the consent of the user.

3.8. To keep our Platforms safe. This data management is (i) based on our legitimate interests (to ensure the security of our Platforms); (ii) is necessary for the provision, exercise and protection of the rights provided for by the law and / or (iii) must be fulfilled according to our statutory obligations.

3.9. To fulfil our statutory obligations.

4. Who are the recipients of the Information collected from the user and what purpose is the information forwarded for?

(Personal data under Article 13 and 44 of the GDPR)

4.1. To achieve the purposes specified in this Information note on the management of personal information, we may receive and send information in connection with the user (including also personal data), if the user uses any of the Platforms managed by us or the data manager and the agents of data managers.

4.2. In addition to this, we draw attention to the fact that if the user decides to share the information with us, including also the Personal data, through the services existing with our commercial partners, apart from this Information note on the management of personal information, the data management policies and / or personal data management information notes of our commercial partners will also be applied at the user. We monitor the collection and / or handling of information collected by our commercial partners on their platforms.

6. Ads intended to appear on social media platforms and ads appearing in our circular mail sent out by e-mail and / or SMS

(Personal data under Article 13 and 44 of the GDPR)

Under the regulations in force and with the consent of the user, we may use the information provided on our Platforms for the purposes of electronic direct marketing (e.g.: (i) for sending newsletters or other information notes about our events, about we think that may be of the clients' interest or (ii) to introduce the ads to the user we intend to display on social media platforms or on third-party websites).

Information related to electronic marketing communication: the consent given can be withdrawn at any time by noting that (i) the user deletes the mark ticked in the relevant field in the user account; (ii) the user clicks on all deletion links in all the information notes sent by the ITL Group to the user, or (iii) contacts us at the addresses indicated in the below Article 13.

Information about ads and targeted content:

In the social media (e.g. Facebook or Twitter): the user may act to withdraw their consent at any time by configuring the ad settings in the social media account.

7. Are the data of the user transmitted? How and where?

We use the Personal data of the user within the European Union ("EU") and do not send the data to countries outside the EU.

8. What rights does the user have in respect of their own personal data?

(Under Article 15, 16, 17, 18, 19, 20 and 21 of the GDPR)

8.1. If it is made possible by the law, the user shall be authorized to receive a copy of the Personal data we have in our possession or to request confirmation of whether or not his or her personal data are managed, and in this case the user shall be authorized to access the data under Article 15 of the GDPR. Before answering the user's question, we may ask the user to (i) verify his identity data and (ii) provide more details to be able to better answer their question. We try to respond within the shortest possible rational time. If the user wishes to exercise this right, he or she must contact us at one of the addresses given below (see also Article 13).

8.2. The user shall be authorized to update, supplement and modify their own Personal data anonymously or to delete them by contacting us at any of the addresses given below (see also Article 13). The user may terminate their own online account at any time and shall be authorized not to give their consent to handling their own Personal data.

In some cases, we may retain some information about the user if this is required by the law or if it is required for other legitimate purposes. For example, if we believe that the user has committed a fraud or violated our General Terms and Conditions of Use, we may decide to retain some information to avoid circumventing the legislation applicable on our Platforms.

8.3. If the user thinks that their rights have been violated, he or she shall be authorized to file a complaint with the competent data protection authority or bring the infringement before a court.

8.4. In addition to this, the user shall be authorized to receive the Personal data concerning them and provided by them to us in an edited and generally used, legible form, or to forward these data to another data manager.

9. Cookies and similar technologies

For more detailed information please see our Information note on cookies.

11. Link to other websites and the social media

Our Platforms may periodically contain links to other websites or advertisers and subsidiaries associated with our network. If the user clicks on the link of these websites, he or she should not forget that these websites have their own privacy policies and that we do not assume any liability for these rules and policies. These policies must always be read before submitting Personal information to these websites.

12. Amendments to the Information note on the management of personal information

Any future amendment to the Information note on the management of personal information will be published on this site. If it is required, we will inform the users thereof or ask for their consent. We ask the user to regularly use this page due to any potential update or modification that we have carried out in the Information note on the management of personal information.

13. Notification addresses and the Person in charge of personal data protection

If the user wants to contact us at any time to exercise their relevant rights or to ask questions about Personal data, he or she can do so at the following address: dataprotection@itlgroup.hu;

14. Data protection obligations

All employees and advisors of the ITL Group are required to sign a confidentiality agreement and complete the compulsory training on confidentiality and data management, as well as the training related to our Code of Conduct. The Code of Conduct of the ITL Group specifically identifies the responsibility and behaviour prescribed for data protection.

15. Use of the services of secondary data processors

The companies of the ITL Group directly perform most of the processing of data needed to provide the services. At the same time, however, we have some external staff ("Data Processor"), who help us in providing these services. Every Data Processor has to go

through a strict selection procedure, the purpose of which is to ensure technical competencies and the capacity to ensure security and data protection at an appropriate level. According to the GDPR, the Data controllers and Data processors must have the appropriate technical and organisational conditions to ensure a level of security corresponding to the given risk. The user may ask for the complete list of Data processors by e-mail sent to the electronic postal address indicated in Article 13 of this Information note.