

## The Privacy Notice of GROW Szervezetfejlesztési Tanácsadó Zrt.

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## I. General part

### 1. Introduction

GROW Szervezetfejlesztési Tanácsadó Zrt (hereinafter: “GROW”) finds it important to safeguard and enforce the rights related to data processing of those applying to its training courses and all other data subjects. GROW processes the personal data of data subjects based on the General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 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 [the “GDPR”]), Act CXII of 2011 on Informational Self-Determination and the Freedom of Information (the “Infotv.”) and other provisions of the law relevant to data protection (listed in detail in the Definitions).

Effective date: 3. October 2026.

### 2. Definitions

The following terms used frequently in this Privacy Notice shall have the meanings provided below:

**Set of data:** The totality of data processed within the same record.

**Data processing by a processor:** the performance of technical and technological tasks related to data processing operations, regardless of the method or means applied for or the place of the implementation of the operations;

**Processor:** The natural person or legal entity or the organisation without legal personality which processes data based on its contract concluded with GROW;

**Media:** The device used for the presentation of the data, including documents. Hard copy or magnetic media, including but not limited to document, magnetic disk, USB drive/stick, CD, DVD, magnetic tape, HDD, video tape, audio tape;

**Data processing by the controller:** Any operation or the totality of operations performed on data, regardless of the procedure applied, including but not limited to the collection, recording, systemization, storage, alteration, use, retrieval from a public or private database, transfer, publication, alignment or combination, blocking, erasure and destruction and the prevention of any future use of data, taking photos, making audio or video recordings;

**Controller:** The natural or legal person or organisation without legal personality which, alone or jointly with others, determines the purposes of the processing of data, makes and implements or appoints a processor to implement decision relevant to the processing of data (including the means to be applied).

**Marking:** The assignment of an identifier to any data so that it may be distinguished from other data in the future. Marking is mandatory, if the data subject challenges the correctness or accuracy of the personal data;

**Destruction:** The total physical destruction of the media containing the data.

**Data transfer:** The process by which the personal data is made accessible to an uniquely identified third person;

**Erasure:** The process of rendering it impossible to recognise data in a way that it can never again be restored.

**Personal data breach:** An event affecting the security of personal data, leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

**Blocking:** The assignment of an identifier to the data for the purpose of the restriction of its continued processing finally or for a definite period of time.

**Applicable legal rules:** GROW performs its data processing activities with regard to the following provisions of law:

- i. GDPR
- ii. Infotv.
- iii. Act IV of 2013 on the Civil Code (the “Civil Code”)
- iv. Act C of 2000 on Accountancy (the “Act on Accountancy”)

- v. Act XLVIII of 2008 on the Essential Conditions and Certain Limitations to Business Advertising Activity (the “Advertising Act”)

**Pseudonymisation:** The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**Anonymisation:** A technical procedure ensuring that the connection between the data subject and the personal data may no longer be restored.

**Restriction of processing:** the marking of stored personal data with the aim of limiting their processing by GROW in the future.

**Biometric data:** personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person (such as facial images or dactyloscopic data);

**Recipient:** a natural or legal person, public authority, or another body, to which the personal data are disclosed, whether a third party or not.

**Direct marketing activity:** the totality of all informational activities and auxiliary services performed by the application of the method of direct contacting and aimed at the recommendation of products or services or the forwarding of advertisements to the data subject in order to promote contracting;

**Data concerning health:** personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

**Electronic Direct Mail (EDM):** electronic mails intended to facilitate the sale of services available at the websites owned by GROW;

**Data subject:** any natural person who is or may be, whether directly or indirectly, identified based on any personal data;

**Subscriber:** Any data subject subscribing to EDM or the newsletter through the websites owned by GROW;

**Supervisory Authority:** an independent public authority which is established in the applicable legal rule of a Member State to verify compliance with the data protection rules;

**Genetic data:** personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

**Websites owned by GROW:** <http://grow.hu/> and <http://grow-group.com/>;

**Third country:** Any country other than the Member States of the European Union or the Member States of the European Economic Area (EEA) (Iceland, Norway and Liechtenstein).

**Third party:** a natural or legal person, public authority or organisation without legal entity, other than the data subject, the controller or the processor.

**Newsletter:** Professional Information sent to addressees electronically (e.g. in e-mail) as part of the service provided by means of the Website owned by GROW;

**Consent:** Any freely and expressly given specific and informed indication of the will of the data subject by which he signifies his agreement to personal data relating to him being processed fully or to the extent of specific operations.

**Document:** Any text, series of figures, sketch, graph or diagram. Unless otherwise provided, the rules relevant to documents shall be duly applied to audio and video recordings.

**Applicant:** Any data subject applying for a training organised by GROW qualifying as adult training in the meaning of Act LXXVII of 2013.

**Joint controllers:** where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers. They shall in a transparent manner determine their respective responsibilities for compliance with the obligations under GDPR, in particular as regards the exercising of the rights of the data subject and their respective duties to provide the information, by means of an arrangement between them unless, and in so far as, the respective responsibilities of the controllers are determined by Union or Member State law to which the controllers are subject. The arrangement may designate a contact point for data subjects.

**Special categories of personal data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic or biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

**Client:** Any client ordering any public education, coaching, training or organisational development service.

**Thod:** The software ensuring so-called gamified learning supporting the learning of the material of trainings, programs and courses organised by GROW;

**Disclosure:** The process of making data available to the public.

**Profiling:** Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person (e.g. performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements).

**Participant:** Any data subject employed by the client and participating at any coaching, training workshop or other activity held based on an agency agreement concluded by GROW with the client.

**Marking of personal data:** The assignment of an identifier to personal data so that it may be distinguished from other data in the future.

**Personal data:** Any and all data related to the data subject, with special regard to his/her name, identification No., one or more physical, physiological, mental, economic, cultural or social identifier(s) and any conclusion which may be drawn from any of the foregoing for the data subject.

**Natural person:** any living person who may be the holder of personal rights, including the protection of personal data;

**Objection:** A statement made by the data subject (whether orally or in writing) to object to the processing of his/her personal data by GROW or to request the termination of data processing or the deletion of the data processed.

### 3. Who is the controller?

Name: **Grow Szervezetfejlesztési Tanácsadó Zrt.**

Principal Office: 1037 Budapest, Montevideo utca 3/A.

Company Registration No.: 01-10-046718

Tax Registration No.: 22785279-2-41

Statistical code: 22785279-7022-114-01 1

E-mail address: office@grow-group.com

Telephone number: +36 1 487 9090

Contact of the data protection officer:

Name: Mátyás Diana Erzsébet

E-mail address: dpo@grow-group.com

In the case of data processing related to coaching, training and organisational development described in detail in the chapter titled “*Data processing operations by GROW*”, GROW shall be deemed to be controller, if the fundamental issues relevant to the manner of data processing (the scope of personal data processed, the duration of the processing, the scope of those with access to the data) are determined by GROW. Should such issues belong to the exclusive competence of the client, GROW shall be regarded as processor in respect of such data processing operations and the information obligation related to data processing shall rest with the client.

### 4. What are the fundamental principles to data processing?

- i. Personal data shall be deemed to preserve such quality as long as it can be attributed to the data subject. Personal data shall be deemed to be attributable to the data subject, if the technical conditions necessary to restore the connection are actually available to GROW.
- ii. GROW may process personal data exclusively in compliance with the provisions of the laws of the European Union and Hungary (*the principle of lawfulness*).
- iii. GROW lays increased emphasis on ensuring that the data processing operations performed by GROW should be clear, transparent (*principle of transparency*) and fair (not misleading) to both the data subjects and GROW. As for the data subjects, GROW provides for meeting the requirement of transparency at its website and through information made available expressly before contacting the data subject for the first time and, within its organisation, by means of the up-to-date records of data processing operations.
- iv. GROW shall process the personal data of data subjects exclusively for the purposes defined in the chapter titled “*Data processing operations by GROW*” (*principle of purpose limitation*).
- v. GROW shall only process personal data which is essential and suitable for realizing the purpose of processing (*principle of data minimisation*).
- vi. GROW shall process personal data only to the extent and for the length of time essential for realizing the purpose of processing (*principle of storage limitation*).
- vii. GROW shall ensure that the data processed should be accurate, complete and, if it is necessary for the purpose of processing, kept up-to-date and that the data subject may be identified only as long as it is absolutely necessary for the purpose of processing by means of rectification performed by GROW or initiated by the data subject following the discovery of any inaccuracy (*principle of accuracy*).
- viii. GROW shall safeguard the confidentiality of and prevent any unauthorized access to the personal data processed by GROW (*principle of confidentiality*).

## 5. Is any processor involved? If so, under what conditions?

- i. The rights and obligations of the processor involved by GROW related to the processing of personal data are determined by GROW in the data processing agreement concluded with the processor in writing with regard to the provisions of the GDPR, the Infotv. and separate legal rules pertaining to data processing. GROW is responsible for the lawfulness of the instructions given to the processor.
- ii. The processor may involve other processor(s) to perform its activities, subject to the provisions formulated by GROW.
- iii. The processor may not make any decision on the merits of the processing, may process the personal data disclosed to it exclusively in accordance with the instructions of GROW, may not process any personal data for its own purposes and is obliged to store and preserve personal data as required by GROW.
- iv. No organisation with an interest in the business activity of GROW may be appointed to act as a processor.

The individual processors and their respective activities are described in detail in the chapter titled “*Data processing operations of GROW*”.

## 6. What measures does GROW apply to guarantee the security of the personal data processed?

- i. GROW shall plan and implement processing operations in a manner ensuring the highest level of protection of the privacy of the data subject in the course of the application of the GDPR, the Infotv. and other rules relevant to data processing.
- ii. GROW and, within its scope of activity, the processor involved by GROW shall duly provide for the safety of data and take any technical and organisational measures and develop any rules of procedure which may be necessary for the enforcement of the GDPR, the Infotv. and other rules governing privacy and confidentiality.
- iii. GROW shall protect data by appropriate measures, such as encryption or anonymization, in particular against unauthorized access, alteration, transmission, public disclosure, deletion or destruction, as well as damage and accidental loss, and to ensure that stored data cannot be rendered inaccessible due to any changes of the applied technique.
- iv. Unless otherwise permitted by the law, GROW shall apply appropriate technical solutions to protect the data processed electronically in its various records against being directly connected with each other or attributed to the data subject.
- v. Should GROW apply an automated decision-making system to process personal data, including but not limited to profiling, GROW and the processor shall take additional measures in order to
  - 1) prevent any unauthorized entry of data;
  - 2) prevent the use of the automated data processing systems by any unauthorized persons by means of any data transfer equipment;
  - 3) check and identify the recipients to which the personal data have been or may be transferred to by means of any data transfer equipment;
  - 4) check and determine what personal data have been entered into the automated data processing system, when and by whom;
  - 5) ensure the restorability of the systems installed in the event of a breakdown and
  - 6) provide for the preparation of a report of any defects arising in the course of automated processing.

- vi. GROW and the processor shall determine and apply the measures ensuring the safety of data due with regard to the state of the art. GROW shall select from several possible processing solutions the one guaranteeing the higher level of protection, unless that would involve unreasonable difficulty for GROW.

## 7. In what cases may personal data be transferred to third parties?

- i. Personal data may be transferred to third parties, i.e. parties other than the data subject, GROW or the processor, based on the *express consent of the data subject* or if it is permitted by the GDPR, the law or an ordinance of the local government.
- ii. According to the effective privacy legislation, data transfers directed at an EU Member State shall be regarded as a data transfer within Hungary. GROW will transfer personal data to non EEA-countries (third countries) only based on the express consent of the data subject or if *the adequate level of protection of the personal data is guaranteed* in the third country. The adequate level of protection of personal data shall be deemed to be guaranteed if it has been established by a binding legal act of the European Union (the list of the countries the privacy regulations of which have been found to be adequate by the European Commission is available at the link: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)).
- iii. Personal data may be forwarded to non-EEA countries in the absence of the consent of the data subject or a decision on the adequacy of the destination country in the following cases:
  - 1) *Without a separate permission by the supervisory authority*
    - a. based on binding corporate rules,
    - b. if the general terms and conditions adopted by the European Commission (and available at the website [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)) are applied,
    - c. if the general terms and conditions approved by the supervisory authority and the European Commission are applied,
    - d. a Code of Conduct is applied,
    - e. if certification is applied.
  - 2) *With the permission of the supervisory authority*, provided that the terms and conditions of the contract concluded between GROW or the processor and the controller or processor within the third country or the international organisation or the recipient of the personal data are applied.
  - 3) In the event of the specific situations described below:
    - a. the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards,
    - b. the transfer is necessary for the performance of a contract between the data subject and GROW or the implementation of pre-contractual measures taken at the data subject's request,
    - c. the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between GROW and another natural or legal person,
    - d. the transfer is necessary for important reasons of public interest,
    - e. the transfer is necessary for the establishment, exercise or defence of legal claims (e.g. an adversarial or an official procedure),
    - f. the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent,

- g. the transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case.

## 8. What are the rights of the data subject and how can they be enforced?

The data subject may contact GROW at the mailing address, e-mail address or phone number provided in chapter 3 to request or initiate

- i. information on the processing of his/her personal data,
- ii. the rectification, erasure or blocking of his/her personal data,
- iii. the transfer of his/her personal data to another controller (data portability),
- iv. the restriction of the data processing,

and also to

- i. object to the data processing,
- ii. initiate not to be subjected to automated decision-making or
- iii. withdraw his/her consent to data processing.

**In the case of joint data processing**, the data subject may apply to GROW for enforcement of his rights, provided that in the case of Face-book Ireland Limited, GROW is not entitled to respond under the [joint data processing agreement](#). If the data subject submits a request to GROW to exercise the rights of the data subject to Facebook Ireland Limited within seven calendar days, the data subject will receive a response from Facebook Ireland Limited within the legal deadline.

### 8.1 The information of the data subject

- i. GROW shall inform the data subject at his/her request of his/her personal data and the categories of personal data processed by GROW or a processor involved by GROW, the sources of such data, the purpose and the period of the processing, the period for which the data will be stored, in the event of the transfer of the personal data of the data subject, the recipients of the data and their categories, the existence of the right to request from GROW the rectification or erasure of personal data or the restriction of processing concerning the data subject or to object to processing, the right to lodge a complaint with a supervisory authority, the source of the personal data processed (if not collected from the data subject directly), automated decision-making (including profiling), the logic applied by automated decision-making and the significance of automated decision-making and its prospective consequences for the data subject.
- ii. GROW shall provide information at the request of the data subject as soon as possible but in no more than 30 days of the date of submission of the express request in writing.
- iii. GROW shall provide such information free of charge, unless the person in question has already filed a request for information concerning the same scope of data in the current year. In all other cases, GROW may request the person requesting information to reimburse GROW the reasonable costs verifiable incurred in connection with providing the information requested. GROW may only refuse to provide the information requested in the cases defined in the GDPR or the Infotv. GROW may refuse to provide information, if
  - 1) the rights of the data subject specified in this chapter (the rights to information, rectification, erasure and blocking) are restricted in the interest of the external or internal security of the state (e.g. defence, national security, the prevention or prosecution of criminal offences or the safety of law-enforcement), with regard to the economic or financial interests

- of the state or the municipality, an important economic or financial interest of the European Union, the prevention and investigation of breaches of ethics or disciplinary requirements related to the exercising of professions or the prevention and exploration of the breaches of labour law and OHS obligations (including checking and inspection all times) or if such rights are restricted by the law in the interest of the safeguarding of the rights of the data subject or other persons, or
  - 2) if the person requesting information is different from the data subject and such person fails to verify his/her authorization to file such request.
- iv. In such cases, GROW shall inform the data subject in writing of the reason for its refusing to provide information.

## 8.2 The rectification, erasure and blocking of personal data

- i. GROW shall rectify any inaccurate personal data if the accurate personal data is available to GROW.
- ii. The personal data shall be erased if
  - 1) the purpose of the processing has ceased to exist,
  - 2) the data subject has withdrawn his/her consent to the processing,
  - 3) the data subject objects to the processing based on legitimate interest (as the legal ground for processing) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes,
  - 4) the personal data have been unlawfully processed,
  - 5) the personal data have to be erased for compliance with a legal obligation provide in the law of the European Union or Hungary to which GROW is subject,
  - 6) it has been so ordered by a court of law or the supervisory authority.
- iii. Where GROW has made the personal data public and is obliged to erase the personal data, GROW, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers which are processing the personal data that the data subject has requested the erasure of any links to, or copy or replication of, those personal data.
- iv. GROW shall block the personal data instead of erasing the same at the request of the data subject or if the erasure thereof is suspected to harm the lawful interests of the data subject. Blocked personal data may be processed no later than as long as the purpose of data processing exists with regard to which the erasure of such data was excluded.
- v. GROW shall mark the personal data processed, if the data subject contests the correctness or accuracy of such personal data, but the incorrectness or inaccuracy thereof may not be clearly established.
- vi. GROW shall give notice of the rectification, blocking or erasure of the personal data to the data subject and every person which such data has been transferred to for the purpose of processing. Such notice may be dispensed with if this would not jeopardize the lawful interest of the data subject with regard to the purpose of the processing.

## 8.3 The right to data portability

- i. The data subject may initiate that GROW shall make available the personal data concerning him or her in a structured, commonly used and machine(computer)-readable format and have the right to the transmission of those data by GROW to another controller directly, provided that
  - 1) the processing is carried out by automated means and
  - 2) the processing is based on the consent of the data subject or necessary for the performance of a contract which the data subject is a party to or for any steps requested to be taken by the data subject before the signing of such contract.

#### **8.4 Right to the restriction of processing**

- i. GROW shall restrict the processing of the personal data of the data subject if any of the following applies:
  - 1) the accuracy of the personal data is contested by the data subject, for a period enabling GROW to verify the accuracy of the personal data,
  - 2) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction by GROW of the period or manner of their use instead,
  - 3) GROW no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims,
  - 4) the data subject has objected to processing of personal data for the legitimate interest of GROW or a third party. In this case, the processing of personal data may be restricted as long as it is verified whether the legitimate grounds of the processing override those of the data subject.
- ii. Where processing has been restricted, the personal data may, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or Hungary.
- iii. The data subject who has initiated the restriction of processing shall be informed by GROW before the restriction of processing is lifted.

#### **8.5 The right to object to the processing of personal data**

- i. The data subject shall have the right to object to the processing of data relating to him/her
  - 1) if the processing or transfer of the personal data is necessary exclusively for the enforcement of the legitimate interest of GROW or any third party, unless it is necessary based on compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims,
  - 2) if the personal data is processed or transferred for direct marketing purposes.
- ii. GROW shall examine the objection to data processing, determine whether it is justified and inform the data subject of its decision without delay but no more than 30 days from the date of submission of the request.
- iii. In the event the objection by the data subject is found justified, GROW shall suspend the processing of the data, including the continued recording or the transfer of data, block the data and give notice of the objection and the measures taken in response to the objection to each party which the personal data subject to the objection has been transferred to, who shall also provide for the appropriate enforcement of the right to objection.
- iv. If the data subject does not agree with the decision of GROW or GROW fails to examine the request in 30 days, the data subject may, in his/her own discretion, file a lawsuit against GROW before the court of law according to his/her permanent abode or usual place of residence in 30 days calculated from the date of communication of the decision of GROW or the expiry of the deadline, as applicable.

#### **8.6 The rights of the data subject related to automated decision-making**

- i. The data subject may initiate with GROW that he/she should not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, unless the automated decision-making

- 1) is necessary for entering into, or the performance of, a contract between the data subject and GROW,
- 2) is authorised by a European Union or Member State law to which GROW is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests,
- 3) is based on the data subject's explicit consent, given in awareness of advance information.

However, in the cases referred to in Sections 1) and 3), GROW shall grant the data subject the right to contest the decision and the right to initiate human intervention (e.g. the subsequent review of the result of the automated decision-making).

- ii. As for special categories of personal data, GROW may apply automated decision-making exclusively based on the express consent of the data subject or if processing is necessary for reasons of substantial public interest, on the basis of a European Union or Hungarian law.

### **8.7 The right to withdraw the consent given**

If the processing of personal data, including special categories of personal data, is based on the consent of the data subject, the data subject may withdraw his/her consent to data processing by sending a statement to GROW using its contact details provided in chapter 3 anytime, in which case GROW will no longer process his/her personal data. The withdrawal of the consent shall not affect the lawfulness of any data processing operation commenced prior to the withdrawal based on the consent of the data subject.

GROW shall inform the data subject of the data processing and perform his/her request for rectification, erasure or blocking in 30 days of receipt thereof, unless GROW does not agree with the request. GROW may call upon the requestor to verify his/her identity in the event of a reasonable doubt regarding the same. In its answer to the request, GROW shall explain the factual and legal grounds for its rejection in sufficient detail.

In the event the data subject does not agree with the decision of GROW, he/she may go to court and decide if he/she files an action with the regional court according to his/her permanent abode (permanent address) or usual residence (temporary address) (the regional courts of law are listed at the website <http://birosag.hu/torvenyszekek>).

You can find the regional court according to your permanent abode or usual residence at the website <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

The data subject is recommended to contact GROW in the first place with any complaint concerning the processing of his/her data by GROW. Such complaints are investigated with due care and circumspection in every case.

Should the data subject be not satisfied with the outcome of the investigation of the complaint, he/she may file a report with the National Authority for Data Protection and Freedom of Information by using the following contact details:

Principal Office: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.,

Mailing address: 1530 Budapest, Pf. 5.

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## **9. What are the consequences of unlawful data processing?**

- i. GROW pays priority attention to ensuring that its data processing operations shall be performed in a lawful manner, i.e. with regard to the principles of data processing, for an appropriate purpose

and based on an appropriate legal basis, in full compliance with the data security requirements all times.

- ii. GROW is obliged to compensate the data subject for any damage caused to the data subject by the unlawful processing of his/her data or the violation of the requirements of data security.
- iii. Should GROW infringe the rights related to personality of the data subject by the lawful processing of his/her data or by violating the requirements of data security, the data subject may also demand GROW to pay restitution for such infringement.
- iv. GROW shall be liable to the data subject for any damage caused by its processor, as well as any restitution for the infringement of the rights related to personality of the data subject by such processor.
- v. GROW shall be released of its liability to pay damages or restitution for the infringement of rights related to personality if it proves that the damage or the infringement of the rights related to personality was attributable to an unavoidable cause beyond the scope of data processing. The data subject may not claim damages or restitution for the infringement of rights related to personality to the extent the damage or the infringement of the rights related to personality occurred due to the intentional or grossly negligent conduct of the damaged party/data subject.

## II. Data processing operations by GROW

### 1. Data processing operations related to the organisation and implementation of training courses

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| <p>Definition of the data processing activity:</p> | <p>registration, storage, keeping, erasure, destruction of personal data according to Act LXXVII of 2013 on Adult Education</p> <p>registration, storage and keeping records of the applicants' data</p> <p>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents</p> <p>contacting applicants after the completion of the training</p> <p>Sending of EDM to applicants and participants</p> <p>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance</p> <p>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents</p> <p>transfer of the data of participants in the training programme (coach training) to the European organisations of ICF and EMCC for the purpose of supporting accreditation administration</p> |
| <p>The purpose of data processing:</p>             | <p><i>registration, storage, keeping, erasure, destruction of personal data according to Act LXXVII of 2013 on Adult Education</i>: performance of legal obligation related to the controller</p> <p><i>registration, storage and keeping records of the applicants' data</i>: preparation of the conclusion of the contract with applicants, keeping contacts during the performance of the contract, invoicing</p> <p><i>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents</i>: performance of the obligation to preserve accounting and tax documents</p> <p><i>contacting after the completion of the training</i>: subsequent review of the effectiveness of the training, using the findings to improve the training courses</p> <p><i>Sending of EDM to applicants and participants</i>: providing information to participants on other training courses organised by the controller</p>                                                                               |

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|                                                                                                                                     | <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance:</i> preparation of the conclusion of the agency contract, keeping contacts during the performance of the contract, invoicing</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents:</i> performance of the obligation to preserve accounting and tax documents</p> <p><i>accreditation administration:</i> ensuring the accreditation option embedded in the coach training programme for participants, supporting accreditation eligibility, application or administration, and managing the related communication and data transfer to the competent organisational units of ICF and/or EMCC</p>                                                                                                                                                                                                                                                                                                                                                                                           |
| The fact of automated decision-making, the logic applied, the significance and consequences of the processing for the data subject: | as part of the given training, personality pattern is developed for the person filling the DISC and the Process Communication Model, GPOP, or Motivational Map tests, which is disclosed to him/her                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| The legal basis for data processing:                                                                                                | <p><i>registration, storage, keeping, deletion, destruction of personal data according to Act LXXVII of 2013 on Adult Education:</i> performance of legal obligation related to the controller</p> <p><i>registration, storage and keeping records of the applicants' data:</i> the conclusion and performance of the training contract</p> <p><i>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents:</i> performance of the legal obligation relevant to the controller</p> <p><i>contacting after the completion of the training:</i> the consent of the data subject</p> <p><i>Sending of EDM to applicants and participants</i> the consent of the data subject</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance:</i> the legitimate interest of the controller</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents:</i> performance of the legal obligation relevant to the controller</p> <p><i>accreditation administration:</i> performance of a contract</p> |
| Definition of the legal basis for data processing:                                                                                  | <i>registration, storage, keeping, deletion, destruction of personal data according to Act LXXVII of 2013 on Adult Education:</i> Paragraph 21, Section (1) of the Act LXXVII of 2013 on Adult Education, Article 6, Section (1), paragraph c) of the GDPR                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                                    | <p><i>registration, storage and keeping records of the applicants' data:</i> Article 6, Section (1), paragraph b) of the GDPR</p> <p><i>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents:</i> Act C of 2000 on Accountancy and Article 78 of Act CL of 2017 on the Rules of Taxation, Article 6, Section (1), paragraph c) of the GDPR</p> <p><i>contacting after the completion of the training:</i> Article 6, Section (1), paragraph a) of the GDPR</p> <p><i>Sending of EDM to applicants and participants:</i> Article 6, Section (1), paragraph a) of the GDPR</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance:</i> Article 6, Section (1), paragraph f) of the GDPR</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents:</i> Article 6, Section (1), paragraph c) of the GDPR</p> <p><i>accreditation administration:</i> Article 6(1)(b) GDPR – processing necessary for the performance of a contract, as the accreditation option is an embedded service element of the training programme</p> |
| Name and address of the processor: | <p>eKRÉTA Informatikai Zrt. (1111 Budapest, Budafoki út 59.)</p> <p>Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America)</p> <p>PSIDIUM ONLINETESZTEK Kft. (2030 Érd, Ürmös utca 46-48.)</p> <p>Jádekör Kft. (2060 Bicske, Bethlen Gábor u. 17.)</p> <p>Kahler Communication Europe (Le Moulin Du Béchet 27120 Croissy-sur-Eure, France)</p> <p>Trainers: contracted instructors and trainers appointed to deliver the relevant training and acting as processors on behalf of the Controller with respect to the data necessary for the performance of the contract.</p> <p>Docca OutSource IT Kft. (1124 Budapest, Apor Vilmos tér 25-26.)</p> <p>Appific Kft. (1021 Budapest, Hűvösvölgyi út 22. 1/7.)</p> <p>Zoom Video Communications, Inc. Address: 55 Almaden Blvd. Suite 600, San Jose, CA 95113 Tel.: 1.888.799.9666; fax: none; e-mail: <a href="mailto:privacy@zoom.us">privacy@zoom.us</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|                                                      | <p>PRAESTA Hungary Kft. (székhely: 2045. Törökbálint, Tulipán u.)</p> <p>Microsoft Ireland Operations Limited, Attn: Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Telephone: +353 1 706 3117.</p> <p>Certifier sp. z o.o. Reg No (KRS): 0000863560 VAT: PL6762586390 Poland, Grodzka 42/1, 31-044 Kraków</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| The processor's activity related to data processing: | <p><i>eKRÉTA Informatikai Zrt.</i>: operation and maintenance of the software (f-Kréta-modul) used to register the data of the training course participants</p> <p><i>Google LLC</i>: storage of the applicants' and participant's data recorded on the application form (G-Suite)</p> <p><i>PSIDIUM ONLINETESZTEK Kft.</i>: making applicants fill in the personality test DISC and forwarding the tests filled in to Grow Zrt.</p> <p><i>Trainers</i>: delivery of the training, communication with participants, documentation of attendance, and the recording of assignments and, where relevant, test or examination results in connection with the relevant training.</p> <p><i>Jádekor Kft.</i>: making applicants fill in the personality Process Communication Model test and forwarding the tests filled in to Grow Zrt</p> <p><i>Kabler Communication Europe</i>: operation of the online filling platform as the holder of the intangible property rights attaching to the Process Communication Model test, including the provision of access to and the storage of the personal data filled in</p> <p><i>Docca OutSource IT Kft.</i>: operation and maintenance of the file server</p> <p><i>Appific Kft.</i>: provision of the system Thod via the internet, provision of technical support for the system, functional and application-level support for the system including the storage of the name, e-mail address, nickname and profile photo of participants by the processor, IP address, user-posted comments and messages sent through our site, and user-uploaded content (e.g. solving exercises)</p> <p><i>Zoom Video Communications</i>: providing an online platform for data controller's training in the case of distance learning, in which participants join the conversation with their own application, with the user-name of their choice</p> <p><i>PRAESTA Hungary Kft.</i>:<br/>reading EMCC-accredited coaching-training and any other written material provided in connection with EQA accreditation. Listening to audio materials, reading exam essays and other written materials, writing exam assessment</p> |

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|                                                         | <p><i>Microsoft Ireland Operations Limited</i>, Attn: storing the data of participants, providing a mailing system, providing an online interface, in the case of training courses held by the data controller in distance learning mode, where participants join the discussion with their own application, using the username of their choice</p> <p><i>Certifier sp. z o.o.</i>: the software enabling the creation, edition and export of electronic certificates, e.g. badge, added the participants surname and first name, and sending it to their e-mail addresses.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| The scope of personal data processed by the controller: | <p><i>registration, storage, keeping, deletion, destruction of personal data according to Act LXXVII of 2013 on Adult Education</i>: storage of the data of the training course participant: signature, name, birth name, mother's maiden name, place and date of birth, e-mail address, education identification number and educational qualification. The educational and professional qualifications, language knowledge related to the training, entering and completing the training or, in the absence of the training, leaving the training, assessment and certification during the training, payment obligations and the training loan used.</p> <p><i>registration, storage and keeping records of the applicants' data</i>: name, phone number, e-mail address, mailing address and signature of the applicant; name, for private proprietors and primary producers: invoicing name and address and tax registration number</p> <p><i>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents</i>: name and mailing address of the applicant; name, for private proprietors and primary producers: invoicing name and address and tax registration number</p> <p><i>contacting after the completion of the training</i>: name, phone number, e-mail address</p> <p><i>Sending of EDM to applicants and participants</i>: name, e-mail address</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance</i>: name, e-mail address, position</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents</i>: name, e-mail address, position</p> <p><i>accreditation administration</i>: personal data necessary for identifying the participant, certifying completion of the training, and supporting accreditation administration, in particular: name, e-mail address, data related to participation in and completion of the training, as well as examination materials submitted by the data subject for accreditation purposes as required by the relevant accreditation process</p> |
| The duration of the data processing:                    | <p><i>registration, storage, keeping, deletion, destruction of personal data according to Act LXXVII of 2013 on Adult Education</i>: eight (8) years from the date the data were generated</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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|                 | <p><i>registration, storage and keeping records of the applicants' data:</i> as long as the statute of limitation for claims arising from the training contract has run</p> <p><i>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents:</i></p> <ol style="list-style-type: none"> <li>period of preservation of accounting documents: 8 years from the date of termination of the training contract,</li> <li>period of preservation of tax documents: as long as the statute of limitation for the right to determine the tax obligation has run; in the case of deferred tax: five years from the last day of the calendar year when the deferred tax falls due</li> </ol> <p><i>contacting after the completion of the training:</i> three years from the date of completion of the training</p> <p><i>Sending of EDM to applicants and participants:</i> as long as the data subject makes an objection</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance:</i> as long as the statute of limitation for claims arising from the agency contract concluded with the client has run</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents:</i></p> <ol style="list-style-type: none"> <li>period of preservation of accounting documents: 8 years from the date of termination of the training contract,</li> <li>period of preservation of tax documents: as long as the statute of limitation for the right to determine the tax obligation has run; in the case of deferred tax: five years from the last day of the calendar year when the deferred tax falls due</li> </ol> <p><i>accreditation administration:</i> the Controller processes the data for as long as necessary to conduct the accreditation administration, and thereafter for the duration of the performance of the training contract and until the limitation period for claims arising from the training contract has expired</p> |
| Source of data: | <p><i>registration, storage, keeping, deletion, destruction of personal data according to Act LXXVII of 2013 on Adult Education:</i> the data subject or the employer of the data subject participating in the training course</p> <p><i>registration, storage and keeping records of the applicants' data:</i> applicant, employer ordering the training</p> <p><i>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents:</i> applicant and the employer ordering the training</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|                                                                                                 | <p><i>contacting after the completion of the training:</i> applicant</p> <p><i>Sending of EDM to applicants and participants:</i> applicant participant</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance:</i> client</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents:</i> client</p> <p><i>accreditation administration:</i> the data originate directly from the data subject and, in connection with the completion of the training, from the Controller's own records</p> |
| Name and full address of the recipient in the case of data transfer to independent controllers: | <p>Adult Education Reporting System (FAR) - Pest County Government Office (1052 Budapest, Városház utca 7.)</p> <p>Hungarian Central Statistical Office (1024 Budapest, Keleti Károly utca 5-7.)</p> <p>EMCC Hungary Association / EMCC Hungary, 1132 Budapest, Váci út 16., ground floor 12.</p> <p>EMCC Global, Avenue Paul-Henri Spaak 17, 1060 Brussels, Belgium</p> <p>ICF Foundation, 2365 Harrodsburg Rd, Suite A325, Lexington, KY 40504, USA</p>                                                                                                                                                                                                                                                                                                              |
| The legal basis for data transfer:                                                              | <p><i>Adult Education Data Reporting System (FAR)</i> - Pest County Government Office, as the state administrative body for adult education required in the Act LXXVII of 2013 on Adult Education - manage the adult education data provision system to keep records in accordance with Paragraph 20/A. of the Act LXXVII of 2013 on Adult Education.</p> <p><i>Hungarian Central Statistical Office:</i> the data subject's consent (transfer of personal data for statistical purposes)</p> <p><i>EMCC and ICF:</i> data transfer necessary for the performance of the training contract and for ensuring the accreditation option; where accreditation is used on an optional basis, Article 6(1)(a) GDPR – the data subject's consent</p>                          |
| Data subjects:                                                                                  | <p><i>registration, storage, keeping, deletion, destruction of personal data according to Act LXXVII of 2013 on Adult Education:</i> the data subject participating in the training course</p> <p><i>registration, storage and keeping records of the applicants' data:</i> data subject applying for the training</p> <p><i>storage of the applicants' data for the purpose of performing the obligation to preserve accounting and tax documents:</i> data subject applying for the training</p>                                                                                                                                                                                                                                                                     |

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|  | <p><i>contacting after the completion of the training:</i> data subject applying for the training</p> <p><i>Sending of EDM to applicants and participants</i> data subject applying, participating for the training</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training in connection with the contracting and performance:</i> contact person of the client</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training for the purpose of performing the obligation to preserve accounting and tax documents:</i> contact person of the client</p> <p><i>accreditation administration:</i> persons participating in the coach training programme for whom the accreditation option or related administration is relevant, and whose data are transferred to ICF and/or EMCC</p> |
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## 2. Data processing operations related to coaching activities

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| Definition of the data processing activity: | <p>registration, storage and keeping records of the persons participating at the coaching</p> <p>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance</p> <p>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of performing the obligation to preserve accounting and tax documents</p> <p>contacting the participants after the completion of the coaching</p>                                                                                                                                                                                                                                                                                                                                                                             |
| The purpose of data processing:             | <p><i>registration, storage and keeping records of the persons participating at the coaching or training:</i> performance of the coaching contract</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance:</i> preparation of the conclusion of the contract, keeping contacts during the performance of the contract, invoicing</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of performing the obligation to preserve accounting and tax documents:</i> performance of the obligation to preserve accounting and tax documents</p> <p><i>contacting the participants after the completion of the coaching:</i> subsequent review of the effectiveness of the coaching, using the findings to improve the service</p> |

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| The fact of automated decision-making, the logic applied, the significance and consequences of the processing for the data subject: | A personality pattern is developed for the person filling the DISC and the Process Communication Model, GPOP, or Motivational Map tests, which is disclosed to him/her and the client                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| The legal basis for data processing:                                                                                                | <p><i>registration, storage and keeping records of the persons participating at the coaching:</i> the participant's consent</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance:</i> the legitimate interest of the controller</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of the performance of the obligation to preserve accounting and tax documents:</i> performance of the legal obligation relevant to the controller</p> <p><i>contacting the participants after the completion of the coaching:</i> the participant's consent</p>                                  |
| Definition of the legal basis for data processing:                                                                                  | <p><i>registration, storage and keeping records of the persons participating at the coaching:</i> Article 6, Section (1), paragraph a) of the GDPR</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance:</i> Article 6, Section (1), paragraph f) of the GDPR</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of performing the obligation to preserve accounting and tax documents:</i> Article 6, Section (1), paragraph c) of the GDPR</p> <p><i>contacting the participants after the completion of the coaching i:</i> Article 6, Section (1), paragraph a) of the GDPR</p> |
| Name and address of the processor:                                                                                                  | <p>Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America)</p> <p>PSIDIUM ONLINETESZTEK Kft. (2030 Érd, Ürmös utca 46-48.)</p> <p>Jádekör Kft. (2060 Bicske, Bethlen Gábor u. 17.)</p> <p>Kahler Communication Europe (Le Moulin Du Béchet 27120 Croisy-sur-Eure, France)</p> <p>Docca OutSource IT Kft. (1124 Budapest, Apor Vilmos tér 25-26.)</p> <p>Appific Kft. (1021 Budapest, Hűvösvölgyi út 22. 1/7.)</p>                                                                                                                                                                                                                                                                                                                                               |

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|                                                      | <p>Zoom Video Communications, Inc. Address: 55 Almaden Blvd. Suite 600, San Jose, CA 95113 Tel.: 1.888.799.9666; fax: none; e-mail: <a href="mailto:privacy@zoom.us">privacy@zoom.us</a></p> <p><i>Coaching Határok Nélkül Szolgáltató Korlátolt Felelősségű Társaság (CHN)</i> 1037 Budapest, Hedvig st. 13.)</p> <p><i>FSC Online Europe</i> s.r.o., having an office located in Ul. Eötvösa 1097/1 945 01 Komárno, Slovak Republic (FSCOLE)</p> <p><i>Microsoft Ireland Operations Limited</i>, Attn: Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Telephone: +353 1 706 3117.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| The processor's activity related to data processing: | <p><i>Google LLC</i>: storage of the participants' data recorded on the application form</p> <p><i>PSIDIUM ONLINETESZTEK Kft.</i>: making participants fill in the personality test DISC and forwarding the tests filled in to Grow Zrt</p> <p><i>Jádekor Kft.</i>: making participants fill in the personality Process Communication Model test and forwarding the tests filled in to Grow Zrt</p> <p><i>Kabler Communication Europe</i>: operation of the online filling platform as the holder of the intangible property rights attaching to the Process Communication Model test, including the storage of the personal data filled in</p> <p><i>Docca OutSource IT Kft.</i>: operation and maintenance of the file server</p> <p><i>MiniCRM Zrt.</i>: storage of the data (name, position, e-mail address, fixed line phone number, mobile phone number) of the contact person of the party ordering the coaching or training</p> <p><i>Appific Kft.</i>: provision of the system Thod via the internet, provision of technical support for the Thod system, functional and application-level support for the Thod system including the storage of the name, e-mail address, nickname and profile photo of participants by the processor</p> <p><i>Zoom Video Communications</i>: providing an online platform for data controller's training in the case of distance learning, in which participants join the conversation with their own application, with the user-name of their choice</p> <p><i>CHN</i>: making participants fill in the personality test Motivational Maps® and forwarding the tests filled in to Grow.</p> <p><i>FSC Online Europe</i>: making participants fill in the personality test GPOP® and forwarding the tests filled in to Grow.</p> <p><i>Microsoft Ireland Operations Limited</i>, Attn: storing the data of participants, providing a mailing system, providing an online interface, in the case of</p> |

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|                                                                | <p>training courses held by the data controller in distance learning mode, where participants join the discussion with their own application, using the username of their choice</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>The scope of personal data processed by the controller:</p> | <p><i>registration, storage and keeping records of the persons participating at the coaching: name, e-mail address, nickname, profile photo, personality pattern developed for the participants based on the e.g. DISC/Process Communication Model, Motivational Maps®/ GPOP®-test filled in</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance: name, phone number, e-mail address</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of performing the obligation to preserve accounting and tax documents: name, phone number, e-mail address</i></p> <p><i>contacting the participants after the completion of the coaching: name, e-mail address</i></p>                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>The duration of the data processing:</p>                    | <p><i>registration, storage and keeping records of the persons participating at the coaching: as long as the contract concluded with the client is performed.</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance: as long as the statute of limitation for claims arising from the contract concluded with the client has run</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of performing the obligation to preserve accounting and tax documents:</i></p> <ul style="list-style-type: none"> <li>c. period of preservation of accounting documents: 8 years from the date of termination of the contract concluded with the client,</li> <li>d. period of preservation of tax documents: as long as the statute of limitation for the right to determine the tax obligation has run; in the case of deferred tax: five years from the last day of the calendar year when the deferred tax falls due</li> </ul> <p><i>contacting the participants after the completion of the coaching: three years from the date of participating</i></p> |
| <p>Source of data:</p>                                         | <p><i>registration, storage and keeping records of the persons participating at the coaching: participant and client</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance: client</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of performing the obligation to preserve accounting and tax documents: client</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|                                                                                                 | <i>contacting the participants after the completion of the coaching:</i> participant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Name and full address of the recipient in the case of data transfer to independent controllers: | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| The legal basis for data transfer to independent controllers:                                   | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Data subjects:                                                                                  | <p><i>registration, storage and keeping records of the persons participating at the coaching:</i> participant</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching in connection with the contracting and performance:</i> contact person of the client</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the coaching for the purpose of performing the obligation to preserve accounting and tax documents:</i> contact person of the client</p> <p><i>contacting the participants after the completion of the coaching:</i> participant</p> |

### 3. Data processing operations related to organisational development

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| Definition of the data processing activity:                                                                                         | <p>registration, storage and keeping records of the data of the persons participating at, workshops and other educational events (evaluators and persons evaluated) (filling the attendance sheet)</p> <p>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event in connection with the contracting and performance</p> <p>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents</p> <p>contacting those participating at the, workshop or other educational event following the completion of the training, workshop or other educational event</p>                                                                                                                                                                                                                                                                                                                                                                                           |
| The purpose of data processing:                                                                                                     | <p><i>registration, storage and keeping records of the data of the persons participating at workshops and other educational events (evaluators and persons evaluated):</i> performance of the contract concluded with the client</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event in connection with the contracting and performance:</i> preparation of the conclusion of the contract with the client, keeping contacts during the performance of the contract, invoicing</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents:</i> performance of the obligation to preserve accounting and tax documents</p> <p><i>contacting those participating at the training, workshop or other educational event following the completion of the workshop or other educational event:</i> subsequent review of the effectiveness of the workshop or other educational event using the findings to improve the service</p> |
| The fact of automated decision-making, the logic applied, the significance and consequences of the processing for the data subject: | <p>an individual personality pattern is developed as part of the 360° survey for the persons subject to the evaluation, which may be disclosed to the subject, as well as his/her direct report and the HR/labour organisational unit of the client</p> <p>An individual personality pattern may be developed for those participating in the Assessment Center / Development Center development program, which may be disclosed to the controller and the client as well</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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|                                                    | <p>Based on the opinion of those participating in the network research survey: (1) the key persons at the organisation (professional and informal opinion leaders) are identified (2) communication diagnostics is drawn up to present the efficiency of information flow, indicating the organisational units/premises (3) a list of the opinion leaders is compiled, subject to the consent of those filling in the questionnaire. The Client may get access to the anonymous communication diagnostics and the list of those data subjects who have expressly accept the position of the opinion leader. The results of the survey may not be disclosed to the Client from any other aspect (raw data, name of those who filled in the questionnaire but refused to be opinion leaders).</p>                                                                                                                                                                                                                                                                                              |
| The legal basis for data processing:               | <p><i>registration, storage and keeping records of the data of the persons participating at workshops and other educational events (evaluators and persons evaluated) (: the participant's consent</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering workshop or other educational event in connection with the contracting and performance: the legitimate interest of the controller</i></p> <p><i>storage of the data of the contact person of the party ordering the workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents: performance of the legal obligation relevant to the controller</i></p> <p><i>contacting those participating at the training, workshop or other educational event following the completion of the workshop or other educational event: the participant's consent</i></p>                                                                                                                                                    |
| Definition of the legal basis for data processing: | <p><i>registration, storage and keeping records of the data of the persons participating at trainings, workshops and other educational events (evaluators and persons evaluated) (filling the attendance sheet): Article 6, Section (1), paragraph a) of the GDPR</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training, workshop or other educational event in connection with the contracting and performance: Article 6, Section (1), paragraph f) of the GDPR</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the training, workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents: Article 6, Section (1), paragraph c) of the GDPR</i></p> <p><i>contacting those participating at the training, workshop or other educational event following the completion of the training, workshop or other educational event: Article 6, Section (1), paragraph a) of the GDPR</i></p> |
| Name and address of the processor:                 | <p>Google LLC (600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America)</p> <p>Docca OutSource IT Kft. (1124 Budapest, Apor Vilmos tér 25-26.)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|                                                      | <p>SurveyMonkey INC (One Curiosity WAY, San Mateo, CA 94403, United States)</p> <p>Silvergard Ltd (Unit 22, Bulrushes Business Park, Coombe Hill Road, East Grinstead, West Sussex, United Kingdom, RH19 4LZ) és MyAdmate Ltd (Marshall House Ring Way, Suite 2, 5th Floor, Preston, United Kingdom, PR1 2QD)</p> <p>LEVEL NINE Kft. (2000 Szentendre, Szélkerék utca 8/b.)</p> <p>Doodle AG (Werdstrasse 21 Postfach 8021 Zürich, Switzerland)</p> <p>MAVEN SEVEN Zrt. (Principal Office: 8200 Veszprém, Ady Endre utca 7. c. ép. 1. em. 2.)</p> <p>Zoom Video Communications, Inc. Address: 55 Almaden Blvd. Suite 600, San Jose, CA 95113 Tel.: 1.888.799.9666; fax: none; e-mail: <a href="mailto:privacy@zoom.us">privacy@zoom.us</a></p> <p>Bridging Insight Ltd. (Floor 6, Quadrant House, 4 Thomas More Square, London, England, E1W 1YW)</p> <p>CaféOpen Kereskedelmi és Szolgáltató Kft.(1028 Budapest, Nedü u. 22/B.)</p> <p><i>Mentimeter AB</i>, Reg. No. 556892-5506, Tulegatan 11, 113 86 Stockholm ("Mentimeter")</p> <p>Microsoft Ireland Operations Limited, Attn: Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Telephone: +353 1 706 3117.</p> |
| The processor's activity related to data processing: | <p><i>Google LLC</i>: storage of the data recorded on the application form filled in by participants</p> <p><i>Docca OutSource IT Kft.</i>: operation and maintenance of the file server</p> <p><i>SurveyMonkey INC (One Curiosity WAY, San Mateo, CA 94403, United States)</i>: making participants fill in the questionnaire and forwarding the answers to the questions and the processed questionnaires to Grow</p> <p><i>Silvergard Ltd és MyAdmate Ltd</i>: operation and maintenance of the software used to manage the 360° survey projects (360HRTtools)</p> <p><i>LEVEL NINE Kft.</i>: making participants fill in the Denison questionnaire and forwarding the answers to the questions and the processed questionnaires to Grow</p> <p><i>Doodle AG</i>: preliminary assessment of the numbers of the participants</p> <p><i>MAVEN SEVEN Zrt.</i>: conducting of the network research survey, collection, analysis and evaluation of data</p> <p><i>Zoom Video Communications</i>: providing an online platform for data controller's training in the case of distance learning, in which participants join</p>                                                                                                      |

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|                                                         | <p>the conversation with their own application, with the user-name of their choice</p> <p><i>Bridging Insight Ltd.:</i> “Spidergap® providing an online interface and system for a 360 ° survey service</p> <p><i>CaféOpen Kereskedelmi és Szolgáltató Kft.:</i> completing the questionnaire with the participants and sending the answers to the questionnaire and the processed questionnaires to Grow using the Quantified Platform (WebApp application) The software is only available online, description: <a href="http://www.quantified.company">www.quantified.company</a>.</p> <p><i>Mentimeter:</i> kitöltetése making participants fill in the quizzes and questionnaires and forwarding the answers to the questions and the processed questionnaires to Grow</p> <p><i>Microsoft Ireland Operations Limited, Attn:</i> storing the data of participants, providing a mailing system, providing an online interface, in the case of training courses held by the data controller in distance learning mode, where participants join the discussion with their own application, using the username of their choice</p>                                |
| The scope of personal data processed by the controller: | <p><i>registration, storage and keeping records of the data of the persons participating at workshops and other educational events (evaluators and persons evaluated):</i> name, e-mail address, position, premises, the personality pattern developed based on the 360° survey and participation in the Assessment Centre / Development Centre development program, involvement as communicator in the network research survey,</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event in connection with the contracting and performance:</i> name, phone number, e-mail address</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents:</i> name, phone number, e-mail address</p> <p><i>contacting those participating at the workshop or other educational event following the completion of the training, workshop or other educational event:</i> name, e-mail address</p> |
| The duration of the data processing:                    | <p><i>registration, storage and keeping records of the data of the persons participating at workshops and other educational events (evaluators and persons evaluated) as long as the contract concluded with the client is performed.</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event in connection with the contracting and performance:</i> as long as the statute of limitation for claims arising from the agency contract concluded with the client has run</p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering, workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents:</i></p>                                                                                                                                                                                                                                                                                                                                          |

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|                                                                                                 | <p>a. period of preservation of accounting documents: 8 years from the date of termination of the training contract,</p> <p>b. period of preservation of tax documents: as long as the statute of limitation for the right to determine the tax obligation has run; in the case of deferred tax: five years from the last day of the calendar year when the deferred tax falls due</p> <p><i>contacting those participating at the training, workshop or other educational event following the completion of the workshop or other educational event: three years from the date of participating</i></p>                                                                                                                                                                                                                                                                                                                          |
| Source of data:                                                                                 | <p><i>registration, storage and keeping records of the data of the persons participating at workshops and other educational events (evaluators and persons evaluated) (filling the attendance sheet): participant and client</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event in connection with the contracting and performance: client</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents: client</i></p> <p><i>contacting those participating at the workshop or other educational event following the completion of the training, workshop or other educational event: participant</i></p>                                  |
| Name and full address of the recipient in the case of data transfer to independent controllers: | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| The legal basis for data transfer to independent controllers:                                   | Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Data subjects:                                                                                  | <p><i>registration, storage and keeping records of the data of the persons participating at workshops and other educational events (evaluators and persons evaluated) (filling the attendance sheet): participant</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event in connection with the contracting and performance: contact person of the client</i></p> <p><i>registration, storage and keeping records of the data of the contact person of the party ordering the workshop or other educational event for the purpose of performing the obligation to preserve accounting and tax documents: contact person of the client</i></p> <p><i>contacting those participating at the workshop or other educational event following the completion of the training, workshop or other educational event: participant</i></p> |

**4. Data processing operations performed for marketing purposes on the websites *grow.hu* and *grow-group.com*, and *thod.app*, data management on GROW's "social media" pages**

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| Definition of the data processing activity:                                | <p>Sending EDM to subscribers to the websites <i>grow.hu</i> or <i>grow-group.com</i>, <i>thod.app</i>, and on the GROW form (registration, storage and erasure of the subscribers' data)</p> <p>Description and promotion of GROW's activities through GROW's "social media" (hereinafter: SM) pages and through the GOOGLE ADS service</p> <p>management of client references and testimonials</p>                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                              |
| The purpose of data processing:                                            | <p>promotion of the controller's available services and the presentation of new services to subscribers and visitors</p> <p><i>references:</i> use of the testimonial/reference opinion provided by the data subject, together with the data subject's name and position, for presenting the Controller's services, building trust, and displaying such content for marketing purposes; ensuring contact with the data subject for the purpose of coordinating the reference (e-mail address)</p> |                                                                                                                                                                                                                                                                                                                                                                                              |
| The essence of joint data controllers and their data management activities | <p>GROW Education Kft. (székhely: 1036 Budapest, Montevideo u. 3/A,)</p>                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Sending newsletters and EDMs on behalf of GROW GROUP, joint marketing activities.</p> <p>The Privacy Notice of GROW Education Kft data management agreement is available here: <a href="https://grow-group.com/en/privacy-policy-grow/">https://grow-group.com/en/privacy-policy-grow/</a></p>                                                                                            |
|                                                                            | <p>FACEBOOK – META (Meta Platforms Ireland Ltd, 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland)</p>                                                                                                                                                                                                                                                                                                                                                                                    | <p>GROW Facebook site, Facebook Pixel services</p> <p>The joint data management agreement is available here: <a href="https://hu-hu.facebook.com/legal/controller_addendum">https://hu-hu.facebook.com/legal/controller_addendum</a></p>                                                                                                                                                     |
|                                                                            | <p>LinkedIn (Wilton Place, Dublin 2, Ireland)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>GROW LinkedIn is operated by LinkedIn Ireland Unlimited Company. LinkedIn operates in accordance with its own privacy policy, available here: <a href="https://www.linkedin.com/legal/privacy-policy?trk=content_footer-privacy-policy">https://www.linkedin.com/legal/privacy-policy?trk=content_footer-privacy-policy</a></p>                                                           |
|                                                                            | <p>GOOGLE ADS (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, D04 E5W5, Ireland)</p>                                                                                                                                                                                                                                                                                                                                                                                              | <p>GROW promotes its services using Google Ads advertising services. The joint controller terms are available here: <a href="https://business.safety.google/adsc-controllerterms/">https://business.safety.google/adsc-controllerterms/</a> Google's Privacy Policy is available here: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a></p> |

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| The fact of automated decision-making, the logic applied, the significance and consequences of the processing for the data subject: | not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| The legal basis for data processing:                                                                                                | EDM: the subscriber's consent<br>SM page: visitor's consent<br><i>references</i> : consent of the data subject                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Definition of the legal basis for data processing:                                                                                  | EDM Article 6, Section (1), paragraph a) of Advertising Act<br>SM: Article 6, Section (1), paragraph a) of Advertising Act<br><i>references</i> : Article 6, Section (1), paragraph a) of the GDPR                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Name and address of the processor:                                                                                                  | <i>SalesAutopilot Kft.</i> (1016 Budapest, Zsolt utca 6/C. IV. em. 4.<br>Postacím: SalesAutopilot Kft. 1538 Budapest, Pf. 515.)<br><br><i>Mátai és Véghe Kreatív Műhely Kft.</i> 2016 Leányfalu, Csaba utca 26.<br><br><i>Márton Medveczky, sole proprietor</i> (48 Petőfi Sándor Street, 2724 Újlengyel, Hungary)<br><br><i>RackForest Kft.</i> (1132 Budapest, Victor Hugo utca 18-22., Hungary)                                                                                                                                                                                                                                                                                                                                  |
| The processor's activity related to data processing:                                                                                | <i>SalesAutopilot Kft.</i> sending EDM on behalf of the controller, based on the database received from the controller, via the application SalesAutopilot<br><br><i>Mátai és Véghe Kreatív Műhely Kft.</i> provides website operation and hosting services, which the textual content of the client reference, as well as the data subject's name and position, are technically stored on the website<br><br><i>Márton Medveczky, sole proprietor</i> : website development and operation, and the provision of web-hosting services.<br><br><i>RackForest Kft.</i> : provision of web hosting services, operation of the server infrastructure, and ensuring the technical availability of the website and the data stored on it. |
| The scope of personal data processed by the controller:                                                                             | <i>EDM</i> : name, e-mail address, interest (by training groups)<br><i>FACEBOOK page</i> :<br>Facebook username, comments posted by visitors, and messages sent through our site, visitor activity (statistics) e.g. the number of visits to our site, the range of comments and visits, the average duration of your video plays, the cities in which visitors are located, and the gender distribution of our visitors                                                                                                                                                                                                                                                                                                            |

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|                                                                                                                      | <p><i>LinkedIn page</i>: username, comments posted by visitors, and messages sent through our site</p> <p><i>GOOGLE ADS</i>: online identifiers, including cookie identifiers, IP addresses, device identifiers, advertising identifiers and click identifiers, together with statistical and behavioural information related to the use of the website and interactions with advertisements.</p> <p><i>references</i>: the data subject's name, e-mail address (for contact purposes only, not public), position, and the textual content of the reference/testimonial provided by the data subject</p> |
| The duration of the data processing:                                                                                 | <p>as long as the consent is withdrawn</p> <p>Additional provision for references: withdrawal of consent shall not affect the lawfulness of processing carried out prior to the withdrawal. The Controller processes the e-mail address for the duration of active contact and until the testimonial/reference is deleted.</p>                                                                                                                                                                                                                                                                           |
| Source of data:                                                                                                      | subscriber, visitor, client                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Name and full address of the recipient in the case of data transfer to independent controllers:                      | See the joint controllers on page 32.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>The legal basis for data transfer to independent controllers:</p> <p>Visitor's consent, Article 6(1)(a) GDPR.</p> | Visitor's consent, Article 6(1)(a) GDPR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Data subjects:                                                                                                       | <p>Persons subscribing to EDM on the controller's website and form</p> <p>Visitors to GROW's LinkedIn and Facebook pages</p> <p>Reference: natural person clients having a contractual or other professional relationship with the Controller who voluntarily provide a testimonial/reference opinion and whose personal data are processed as set out in this table</p>                                                                                                                                                                                                                                 |