

IBS International Business School
PROSPECTUS ON PROCESSING OF PERSONAL DATA
effective from May 25, 2018

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With reference to Section 20 Article (4) of Act No. 112 (2011) on Informational Self-determination and Freedom of Information (hereinafter: Information Act) on the right to information self-determination and freedom of information IBS International Business School (IBS) as Data Controller (hereafter referred to as the Data Controller) informs its students, employees, applicants for subscription, participants of educational programmes other than those delivered under the Act No. 204 (2011) on National Higher Education (hereinafter: HE Act), attendants of other events organized by the School, its business partners as well as other persons visiting this website and other data subjects through the publication of this Prospectus on its practices of processing personal data.

The Data Controller

The Data Controller is IBS International Business School (FI 35200)

Headquarters / Postal Address: 1031 Budapest, Záhony u. 7

Tax number: 18086223-2-41

Contact: dataprotection@ibs-b.hu or <http://www.ibs-b.hu>

Data Processing Registration Number: NAIH-62227/2013

In order to establish and continuously provide legitimate data processing, the School shall act in accordance with the following legal requirements in processing, registration, technical processing and transfer of personal data of the data subjects:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as the EU Regulation or GDPR), and
- Act No. 112 (2011) on Informational Self-determination and Freedom of Information (hereinafter: Information Act);
- Act No. 204 (2011) on National Higher Education (hereinafter: HE Act);
- Act No. 53 (2017) on the Prevention and Inhibition of Money Laundering and Terrorism Financing; (hereinafter referred to as the ML Act);
- Act No. 119 (1995) on the Processing of Name and Address Data for Research and Direct Business Acquisition (hereinafter referred to as the RBA Act);
- Act No. 48 (2008) on the Conditions and Limitations of Economic Advertising Activity; (hereinafter: EA Act);
- Act No. 66 (1992) on the Registration of Citizens' Personal Data and Address (hereinafter: Reg. Act); as well as
- any other statutory and internal regulations that contain compulsory data processing provisions for the School.

Data protection terminology

The terms used in this prospectus are the following:

Data Subject: Students of academic programmes delivered under the HE Act, including those participating in programmes offered under collaboration with foreign partner institutions, attendants of other educational programmes, participants of events organized by the School, employees, contractual partners (collectively: all data subjects).

Personal Data: Any information relating to an identified or identifiable natural person, especially the name, the or one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person; as well as any conclusions drawn about that natural person based on the data.

Special categories of personal data: data on the on the state of health or ability to participate in college education, on any potential disability related to it and other sensitive personal data.

Data Controller: The person or an organization that determines the purposes and means of the processing of personal data, takes and executes decisions regarding data processing (including the method used) or mandates another data processor to do so.

Data processing: Any operation or set of operations which is performed on data or on sets of data, such as collection; recording; organisation; structuring; storage; adaptation or alteration; retrieval; consultation; use; disclosure; alignment or linking; restriction; erasure or destruction as well as preventing the subsequent use of data; creating photo, sound, or video recordings; or recording physical features that are capable of identifying the subject.

Data Processor:

A natural or legal person or an organization that is not a legal person which processes personal data on behalf of the controller under contract (including those mandated by laws and regulations) with the data controller.

Technical processing:

Performing technical tasks related to data processing, irrespective of the method and device used to perform the operations and the location, provided that the technical task is performed on the data.

Data transfer:

Making the data available to a specified third party.

Newsletter: information typically provided by electronic mail periodically on news, the activities of the School, the use of services, their changes, School events and conditions influencing the operation.

Marketing information: advertising and marketing material about the activities, services, supplementary services and events of the School and its partner institutions.

I. Basic provisions concerning data processing

1. The purpose of data processing

Personal data may only be processed for a specific purpose, for exercising a right and for the fulfillment of an obligation.

The purpose of data processing by the School, primarily based on the statutory authorization in the HE Act, is to provide its students with the educational services of the School as required by the HE Act as well as to contact provide information for those related to these services (if necessary, the close relatives of the students). For the purpose of providing these services, the School processes the personal data provided by the student when applying for the service.

In addition, the School processes the personal data of the employees / private agents as necessary in the course of its operations, the personal data of its contracting partners or the data

of natural persons concerned by ad hoc requests in the range and time allowed by the related consent.

Data processing must be in line with the purpose of data processing at all stages, data recording and processing must be fair and legitimate. Only personal data that are essential for achieving the purpose of data processing can be processed to achieve this goal. Personal data can only be processed to the extent and for the duration required to achieve the goal. Data processing must ensure that the data are accurate, complete and, if necessary for the purpose of data processing, up-to-date and that the data subject can only be identified for the duration necessitated by the data processing purpose.

The School provides more detailed information about the legal basis, purpose and important facts related to the data processing hereunder.

2. Legal basis of the data processing

The School is processing data as a general rule as statutory (HE Act) data processing and on the basis of a contractual relationship or the consent of the Data Subject. Legal data processing is primarily connected to the education and research activities of the School, based on the authorization provided by the HE Act. The purpose of the data processing is to process data in connection with the student status of the students, the fulfillment of the School's statutory obligations, and to keep in touch with the students.

Data processing may be based on the Information Act, the consent of the (prospective) student / participant, a statutory mandate or a different item in the GDPR. With respect to the data fields specified in the consent statement, the student gives the unambiguous acceptance to the comprehensive processing of his/her personal data in connection with his/her school activity, as set out in this Prospectus. The consent is given in writing (or online by providing the requested data in the form on the website) by filling in the application form (online application form) or the contract of education. Data relating to the health status classified as special data are processed by the School on the basis of the authority of the law (see the "Supplementary Regulation to the Study and Examination Regulations on the Conditions Ensuring Equal Rights to Students with Disabilities in Progressing with their Studies").

In the case of data processing on basis of the consent of the data subject, the data provision is voluntary and the data subject is not required to give consent to the processing of data. However, he/she acknowledges that in the absence of mandatory data, the School can not provide specific services dependent on data provision.

3. Duration of the data processing

Upon the termination of the student's legal status on basis of the HE Act the School must go on processing the personal data for the duration prescribed by the School records regulation.

Unless a legal provision is made, the School will process the data until the goal is reached or when the consent is withdrawn by the data subject, or until the data erasure time as per the request of the data subject.

4. Data controllers, data processors

The personal data shall be accessed by the School and the data processing organizations and their employees / agents for whom getting to know the data is indispensable for carrying out their respective tasks.

In relation to the persons / organizations authorized to access the data, Appendix 3 of the HE Act permits the School to outsource activities related to higher education and other statutory activities involving data processing.

In the cases and within the framework of legal regulations the data can be transferred to organizations acting in their duties upon written request of these bodies to the School:

- a) to the authority responsible for controlling the lawful operation of the School (Educational Authority) and to the Higher Education Information System
- b) to the authority investigating criminal cases, the prosecutor's office, the prosecuting authorities dealing with complaint supplements,
- c) in the case the conditions specified in a separate law are met, to the body responsible for collecting secret information,
- d) to the national security service acting within the scope of its statutory tasks,
- (e) as regards the data necessary for recording the accounts to the service provider operating the records, and the relevant circle of data to those carrying out the outsourced activity,
- f) to the Ombudsman for Fundamental Rights,
- (g) to the Aliens Office acting within its remit.

II. The scope of the data and data subjects involved the purpose, method and content of data processing

1. Applicants and students of the School's bachelor, masters and other programmes

1.1. Data of the data subjects applying for the educational programmes of the School on the website (by filling in the online registration form) will be processed by the School on the basis of voluntary consent of the data subject prior to successful admission to the bachelor and masters programmes (and after admission in case of other programmes). Data processed in this regard are as follows¹:

- personal data (name, date of birth, mother's name) *,
- contact details (address, mailing address, telephone, email) *,
- contact details of parents, relatives (for emergency cases)
- details of the chosen programme *,
- student accommodation request,

¹ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

- uploaded documents,
- marketing data (about the process of getting to know IBS).

By submitting the data, the applicant declares that they are

true. The activity and procedure involved in data processing:

- The data subject can enter their data specified above and send them to the data controller by clicking on the web site.
- The information provided is transferred to the School's server via an encrypted channel.
- The data controller processes the data and contacts the data subjects.

Data processing duration: in case of data processing on basis of the HE Act the time, frame specified therein or until the data erasure requested by the data subject is completed.

Data shall not be communicated to a third party - with the exception of cases specified in Article 1.3 or the express consent of the data subject.

Data will be processed electronically and/or on paper, manually.

Source of data: direct from the data subject.

1.2. After successful enrolment to the Schools bachelor and master's programmes through the website (or via felvi.hu), the School shall be entitled to process data for the purpose set out in Section 18 of the HE Act according to and in the range specified in Appendix 3 of the HE Act. It will process the following data provided through the website on the online admission form also after the admission on the candidate's consent²:

- personal data (name, date of birth, mother's name) *,
- contact details (address, mailing address, telephone, email) *,
- contact details of parents, relatives (for emergency cases)
- details of the chosen programme *,
- student accommodation request,
- uploaded documents,
- marketing data (about the process of getting to know IBS).

By submitting the data the applicant declares that they are true.

The activity and procedure involved in data processing (in case of applying through the School's website):

- The data subject can enter their data specified above and send them to the data controller by clicking on the web site.
- The information provided is transferred to the School's server via an encrypted channel.
- The data controller processes the data and contacts the data subjects.

Data processing duration: in case of data processing on basis of the HE Act the time frame specified therein or until the data erasure requested by the data subject is completed.

² With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

Data shall not be communicated to a third party - with the exception of cases specified in Article 1.3 or the express consent of the data subject.

Data will be processed electronically and/or on paper, manually.

Source of data: direct from the data subject.

1.3. In connection with the enrollment of students, the School has hired contractual partners (data processors) for student recruitment. The data processing partner is only entitled to receive data of the candidates / students who are involved in the contributing activities of the respective partner, for specific purposes and subject to the relevant legislation. In this scope, the School or the data processing partner acting on its behalf shall, on the basis of the consent of the applicant, process the following information prior to and after the admission of the student to the programme³:

- personal data (name, date of birth, mother's name) *,
- contact details (address, mailing address, telephone, email) *,
- contact details of parents, relatives (for emergency cases)
- details of the chosen programme *,
- student accommodation request,
- uploaded documents,
- marketing data (about the process of getting to know IBS).

By submitting the data the applicant declares that they are true.

The activity and procedure involved in data processing:

- a. The data subject can send their data specified above the data controller electronically or on paper.
- b. The data controller processes the data and contacts the data subjects.

Data processing duration: until the data erasure requested by the data subject is completed.

Data shall not be communicated to a third party - with the exception of the contractual data processing partner specified in the present cases specified in this article or upon the explicit consent of the data subject.

Data will be processed electronically and/or on paper, manually.

Source of data: direct from the data subject.

2. Visitors of the website

When visiting www.ibs-b.com website of the data controller the visitor receives a session ID anonymously, which is used by Google Analytics to record the start and end times of the visit

³ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

and the pages visited for statistical purposes, regardless of personal data. All new visitors will be informed about it on the first page download.

The purpose of using anonymous session IDs and cookies by Google Analytics is statistical. Along with the registration the user voluntarily agrees that the data types referred to in point 2 will be used by the data controller in accordance with the provisions of the Prospectus on Processing of Personal Data. The data provided shall be used confidentially by the data controller.

By sending the data the visitor / user declares that they are true.

Cookies created by Google Analytics last for 30 days, and session IDs are automatically erased when leaving the page. User data will be erased by the data controller within 10 working days on written request of the user. This claim can be reported at the dataprotection@ibs-b.hu e-mail address

Article IV contains more detailed information in connection with the visit data of the website.

III. Data processing for marketing purposes

1. Subscribers to a newsletter

When the student status is established the data subject can subscribe to the newsletter of the data controller providing news, announcements and other information and also sign up for a marketing newsletter. In addition, any natural person may subscribe to the data controller's newsletter on services.

Subscribing to the newsletter (and other marketing-related ad hoc requests) is voluntary.

Scope of data subjects: All students or natural persons who wish to be notified of the data controller's news regularly and therefore subscribes to the newsletter service by providing their personal data.

The data being processed and the purpose of data processing:

Name * identification
e-mail address * for sending newsletter⁴

The purpose of data processing regarding the sending of newsletter / marketing material is to identify the data subject, distinguish him/her from other users; the full or generalized information of the recipient on the data controller's news, training / services / events. The purpose of data processing is also to maintain contact with the user; testing and measuring recipient satisfaction. The newsletter registration also allows you to apply to the events announced on the website.

⁴ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

The sending of newsletters / marketing material will be made by the data processor assigned to this task by and specified in the relevant section of this Prospectus on behalf of the data controller as regulated by the relevant contract.

The mailing of a newsletter / marketing material is done only with the prior consent of the data subject.

The data controller and the data controller's data processor will only process the personal data collected for this purpose until the data subject unsubscribes from the newsletter or provides a confirmation in the case described in point 11.

Data subject can unsubscribe from the newsletter at any time by clicking at the bottom of the electronic mails and by sending an e-mail to info@ibs-b.hu. He/she can unsubscribe from the newsletter by mail at the following address: 1031 Budapest, Záhony u. 7. The application must include the minimum information and circumstances necessary for identifying entitlement to the erasure so that the cancellation can be legitimately carried out.

Source of data: direct from the data subject.

The data controller reviews the newsletter list every five years and requests a confirmation for sending newsletters after five years. Data of a subject who does not give a confirmatory consent will be deleted from the data set by the data controller.

Data processing duration: until the relevant contribution is withdrawn by the data subject (until data erasure is requested).

The data controller and data processor will keep statistics on the posted newsletters read, by counting the clicks on the links to newsletters.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

2. Prize games

The Data Controller allows the data subjects to participate in a prize game by providing the data detailed below, based on the rules of the respective prize game. The current prize game (s) and the relevant game rules and conditions are available on the website or leaflet (education exhibition).

Participation in the prize game is based on a voluntary permit.

Data Subjects: All natural persons who wish to participate in the prize game organized by the Data Controller.

The scope and goals of the data being processed:

name* ⁵	identification	
phone number*	contact	
e-mail address*	contacts	
year of secondary school graduation		identification

The purpose of the data processing is to identify the data subjects during the prize draw and to keep in touch.

The activity and process involved in data processing are as follows:

- Data subjects may apply to the prize game by giving their data according to the rules of the game.
- The Data Controller records the data electronically and / or on paper according to the rules of the prize game and performs prize draw.
- The Data Controller will inform the winners by using the contact details supplied.
- The Data Controller may make the name of the winners available to other persons and third parties (public announcement of results) according to the rules of the given game and he/she should call the Data Subjects' attention to this, thereby providing the possibility of considering their participation in the prize game.
- Data Subject, in accordance with the purpose of the data processing, voluntarily consent to be contacted by the Data Controller through his or her provided contact details to inform him/her of any incapacity of the prize game, to clarify way of receiving the prize, to respond to any potential complaint or to take any other action regarding his/her complaint.

Duration of data processing: for identity and contact details, until the expiration of the enforceability of the rights and obligations deriving from the legal relationship in which the Data Controller processes the personal data in connection with the legal relationship regarding data that are evidenced and the document supports the accounting records, the duration as per Article (2) of Section 169 of Act No. 100 of year 2000 is a minimum of 8 years.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

3. Questionnaire, evaluation system

As part of the quality assurance process used by the Data Controller, Data Subjects can provide their opinion online, by e-mail and paper based questionnaire and by the evaluation system.

Completing the evaluation questionnaire is based on a voluntary contribution.

Scope of the data subjects: All natural persons who have used the services of the Data Controller and evaluate them with the purpose of improving quality and / or feedback.

⁵ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

The scope and goals of the data being processed:

name*	identification
e-mail address*	contacts ⁶
textual evaluation	quality assurance
multi-grade assessment of the services provided by the data controller	quality assurance

The purpose of the data processing is enhancing the quality of the services, investigating complaints and maintaining contact.

Supplying data is not compulsory, it only serves the purpose of investigating eventual complaints and assuring that the data subject receives feedback.

The activity and the procedure related to the data processing are as follows:

The data subject may evaluate the Data Controller and its services / products by filling in questionnaires or submitting free text comments.

The data subject makes the Data Controller aware of his/her evaluation by electronic way and/or on paper.

- Data Controller stores the evaluations sent electronically in the electronic registration system used for this purpose.
- The Data Controller processes the paper-based questionnaires for quality enhancement purposes and stores them in accordance with the Records Management Rules.
- In the event of a complaint, the Data Controller shall respond in writing to the data subject.
- Data Subject, in accordance with the purpose of data processing, voluntarily agrees that if contact information has been provided, he/she will be contacted by the Data Controller to respond or to take other actions regarding the complaint.

The Data Controller may use the comments received on questionnaires or in the evaluation system for statistical purposes in a way ensuring that it can not be linked to the name of the data subject.

Duration of data processing: until the goal is achieved.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

⁶ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

IV. Website-related data processing – visit data

1. *References and links*

The website of the Data Controller (www.ibs-b.hu) may also contain links that point to pages that are not operated by the Data Controller, but are intended only to inform visitors. The Data Controller has no influence over the content and security of the websites operated by the partner companies, so it does not bear any responsibility for them.

The Data Controller therefore asks the data subjects to review the privacy statement of the pages they visit before submitting their data in any given form.

2. *Cookies*

The Data Controller provides the following information as regards the analytical tools i.e. cookies it uses.

The Data Controller uses the following cookies for the purposes defined below:

- a. Absolutely necessary cookies
 - i. Such cookies are indispensable for the proper functioning of the website. Without the acceptance of these cookies, the Data Controller can not guarantee the proper functioning of the website or the user's access to any user-requested information.
 - ii. These cookies do not collect personal information from the data subject or any data that may be used for marketing purposes.
 - iii. Cookies that are absolutely necessary are, for example, performance cookies that collect information about whether the website is working properly and whether it is experiencing any errors. By indicating errors are indicated, they help the Data Controller to improve the website and indicate which are the most popular parts of the site.
- b. Functional cookies
 - i. These cookies ensure consistent appearance of the website meeting the needs of and noting the settings chosen by the data subject (such as color, font size, layout).
- c. Targeted cookies
 - i. Targeted cookies ensure that ads appearing on the website are tailored to the interests of the subject. The website primarily addresses the services provided by the Data Controller and it facilitates the data subject's access to more favorable offers.
- d. Cookies of third party
 - i. The website may display a cookie provided by a third party, such as a social networking site, that allows to share or like a given content and to send information to third parties that they may later use to show ads to the data subject on other websites, too.

The cookie may also help to improve the website ergonomoy, to setup a user-friendly website and to enhance the online experience of the visitors.

3. Analytics, Facebook pixel

Data Controller embeds a JavaScript code in the website (or in any of its sub-pages) by using a Facebook pixel (formerly called conversion tracking pixel) device which sends a message to Facebook when the user visits the site or performs an action on it. On the one hand, it helps to understand the return on the Data Controller's advertising costs and, on the other hand, makes it easier for the Data Controller to show ads to users who are more likely to convert from Facebook. The Facebook pixel does not collect, store, or transmit personal data. For more information about using Facebook pixel visit www.facebook.com.

4. Facebook remarketing

The Data Controller places a set of code in the website (or any of its sub-pages) that aims to make the Data Controller's advertisements available to the user visiting the website while he/she is using Facebook. The Facebook remarketing code set does not collect, store, or forward personal data. For more information about using the code set, see www.facebook.com.

5. Google Adwords remarketing

The Data Controller places a set of code in the website (or any of its sub-pages) that aims to make the Data Controller's advertisements available to the user visiting the website while he/she is browsing on the websites of the Google Display Network or searching for a term related to the Data Controller or the Data Controller's services in the Google system. The code set does not collect, store, or forward personal data. For more information about using the code set, see <http://support.google.com>.

Based on the above the Data Controller does not use the analytic systems for collecting personal data.

The Data Controller draws users' attention that most web browsers automatically accept cookies, but visitors have the option to delete them or automatically reject them.

Since each browser is different, users can customize their cookie preferences by using the browser toolbar individually.

The Data Controller draws users' attention that some features may not be available on the website if they choose not to accept cookies.

V. Presence on social network websites and marketing

Data Controller is available on facebook.com/Instagram/LinkedIn/Twitter/Google+/Youtube/Pinterest/SnapChat and other community sites.

The use of social network sites, and in particular the use of the Facebook, establishing and maintaining contact with the Data Controller through it as well as other activities permitted by the community site are based on voluntary consent.

Scope of data subjects: Natural persons who voluntarily follow, share or like the contents of the social network sites and in particular that of facebook.com of the Data Controller.

The scope and goals of the data being processed:

public name of the data subject* ⁷	identification
public photo of the data subject*	identification
public e-mail address*	contacts
message sent by the data subject through the social network site	contacts, base for responding
result of the evaluation or other operation of the data subject	quality enhancement

The Data Controller shall communicate with the data subjects through a social network site and thus the scope of the data processed will become substantial only if the subject contacts the Data Controller through the social network website.

Presence on the social network sites and especially on Facebook and the related data processing aim to share, publish and market the website contents on community pages. Data subjects can also get information on the latest actions that way.

According to the terms of the community site, the data subject voluntarily consents to following the contents of the Data Controller. To illustrate it, the data subject can subscribe to the news and offers of the Data Controller to appear on his own message wall by clicking on the "like" link on the Facebook site and can unsubscribe by clicking on the „dislike” button. Settings in the message wall can be used to delete unwanted news items that appear on the wall.

The data subject can submit a textual or numerical evaluation of the Data Controller as well, if this is made possible by the social network site.

Data Controller also publishes photos, videos of different events, services, etc. on its community webpage and in particular on Facebook. The Facebook site can also be linked to other social network websites according to the regulations of facebook.com and thus making something public on the Facebook includes publishing on such linked community sites as well.

In cases other than a mass shooting or public appearances (Civil Coda Section 2:48) the Data Controller shall always ask for the written consent of the data subject before making the photos public.

Data subjects can receive information on the data processing of the social network website on the given site. Accordingly, information on the data processing of Facebook information is available on the www.facebook.com address.

Duration of data processing: until the goal is achieved.

Data are not sent to third parties.

⁷ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

VI. Data processing for data generated by a single request for information from the Data Controller

The Data Controller allows the data subjects to request information from the Data Controller by providing data detailed below.

Processing of the data given in the request for information is based on a voluntary consent.

Scope of data subjects: Any natural person who contacts the Data Controller and requests information from the Data Controller while providing his / her personal data.

The scope and goals of the data being processed:

name* ⁸	identification
phone number	contacts
e-mail address*	contacts
contents of the question*	answering

The purpose of data processing is to provide appropriate information for the data subject and to keep contact.

The activity and process of data processing are as follows:

- a. The data subject may contact the Data Controller through the way the Data Controller grants him or her access to the Data Controller's products, services, and / or other related matters.
- b. Data Controller answers the data subject's question the same way the question has been sent, unless the data subject requires otherwise.
- c. Data subject, in accordance with the purpose of data processing, voluntarily agrees that if he/she has provided his/her availability details when requesting information, the Data Controller will contact him/her to clarify or answer the question.

Duration of data processing: until the goal is achieved.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

⁸ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

Automated decision making and profiling will not take place in relation with the data processing.

Duration of data processing: until the goal is achieved. In the event of a legal effect on the request for information and/or the supplying of information, or the data subject or the Data Controller is significantly affected, the Data Controller processes the data within the expiry period.

VII. Data processed in the course of continuous, regular contact

The Data Controller ensures that the data subject is constantly or regularly contacted in different ways and fora. Examples are e-mail (electronic contact), or post or telephone contact. (E.g. correspondence with a data subject.)

The legal basis for data processing is the voluntary consent of the data subject. In the event that the Data Controller and the data subject conclude an agreement with each other for example on the use of a product or a service of the Data Controller, the legal basis for data processing is based on a contract. Contacting and maintaining contact and processing of the relevant data may be based on the legitimate interest of the data subject, a third party or the Data Controller, as well as on other legally defined legal grounds, such as mandatory by law (see Legal Basis and Legality chapter of the GDPR). In the case of a data subject request, the Data Controller supplies information on the legal basis of processing his/her data.

Scope of data subjects: Any natural person, including a natural person acting on behalf of or representing an organization, who, in addition to a one-off request for information, keeps continuous or regular contact with the Data Controller.

The scope and goals of the data being processed:

name* ⁹	identification
phone number	contacts
e-mail address*	contacts
question and data supplied by the data subject*	answering

The purpose of the data processing is to keep in touch with the data subject, answering questions, fulfilling requests.

The activity and process of data processing are as follows:

- a. The data subject may contact and keep in touch with, ask questions, send requests to the Data Controller through the way the Data Controller grants him or her access to (e.g. personally, by phone), in writing (by mail, e-mail, on a chat platform).
- b. Based on the content of the contact, law and internal regulations, the Data Controller shall take the necessary steps and inform the data subject.

⁹ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

Duration of the data processing: until the goal is reached, or - if it is required by interests of the data subject or a third party or the data manager, or in order to fulfill an obligation - after the goal is reached, until the interest has ceased to exist or until the obligation is fulfilled. If, on the basis of the way of data processing or otherwise, the law determines the duration, the Data Controller processes the data for the specified period of time.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

VIII. Processing of data of job applicants

The Data Controller will allow the data subjects to apply for a job that they announce in the way indicated in the job announcement (e.g. on an electronic or paper basis) or to apply directly, without a written job announcement.

Applying for a job is based on voluntary consent.

Scope of data subjects: All natural persons applying for a job position to the Data Controller.

The scope and goals of the data being processed:

- name*¹⁰ identification
- place and date of birth* identification
- position applied for* identification of the application
- special data, e.g. health data (special data shall only be processed if it is necessary for deciding on the job application)
- work experience – name of previous employers, time spent in previous job, work experience necessary to fill in the position
- previous work position – to assess if the applicant possesses the necessary experience
- qualifications – to judge if they are in line with the qualification required for the position
- foreign language knowledge – foreign languages spoken and level of knowledge to assess adequacy for the job position
- other data in the curriculum vitae attached – other data in the attached CV relevant to the job
- motivation letter – contents of the motivation letter necessary for assessing the application
- indication of consent to processing the data for 2 years from the date of application in case the application is not successful – necessary for the legal base of processing the relevant data

The purpose of the data processing is assessing the job application and keeping contact.

¹⁰ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

The activity and process of data processing are as follows:

- a. Data subject submits his/her data to the Data Controller by the way specified in the job announcement. Application is typically but not exclusively carried out by sending data by electronic way.
- b. If the application is made through the website, the information provided is transmitted to the server of the website via an encrypted channel.
- c. In the selection process, the Data Controller compares the applications with the conditions set for filling in the position and other conditions for creating a job / other legal relationship and upon that comparison, the most appropriate persons are called for a personal interview.
- d. The selection process continues with a personal interview or with a written test.
- e. The selection process ends by signing the contract with the most appropriate data subject. Nota bene the data of the data subjects not selected can only be processed by the Data Controller in future if the data subjects have explicitly given their consent to it and it has been directly asked in a verifiable way.
- f. Data processor informs the applicant data subjects about the result of the selection and asks for their consent to processing their data for another 2 years for applying for the same or similar job positions, if such consent has not been given by the data subject before (e.g. on the website).
- g. In case the consent is given, the Data Controller attaches it to the data and stores it.

Data subject acknowledges, that if he/she has named a reference person during the job application, the Data Controller is entitled to get in contact with this person in order to control the professional experience of the data subject.

Duration of the data processing: until the goal is reached, or – upon the consent of the data subject – for 2 years after the application date or until the data subject applying for data erasure.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

IX. Employment related data processing

1. Employees' records

According to the law, the Data Controller must record and transfer data to the state tax and customs authorities and to other official records related to its activity (FIR) in the case of employment, simplified employment or assignment relations.

The establishment of a legal relationship is based on a voluntary consent but the provision of information on the insurance relationship to the state tax and customs authorities i.e. data recording, data processing is mandatory as per Art. 3 of Annex 1 of Act No. CL of 2017 on Taxation and Sections 3 and 11 of the Act LXXV of 2010 on Simplified Employment. The School's other activity-related records and data provision (FIR) are also legally binding and compulsory (see Decree HE Act and Government Decree 87 of 2015 (April 9)).

Scope of data subjects: Any natural person who establishes a work relationship with the Data Controller or other legal relationship for which the Data Controller has a duty to report.

Data processed and provided to the state tax and customs authorities in the case of employment: family and first name of the insured*, tax identification number*, date of birth*, start date of insurance*, code*, termination of insurance*, duration of insurance intermission*, weekly working time* FEOR (Classification of Professions) number*, TAJ (Social Security) number*, name of the institution issuing the degree and qualification and the number of the document*; if the insured does not have a tax ID, the given and surname at birth, the place of birth, mother's first and surname at birth and the nationality of the insured shall also be reported*; bank account number, identity card number, telephone number, e-mail address, photo of the aata subject, language knowledge, job position, job description, executive assignments, internships, exams, probation times, disciplinary proceedings, penalties, exemptions, wage grades, time spent in work, time considered as employment, classification data.

In case of assignment relations the scope of the processed data includes also the gross assignment fee, net fee*, bank account number, place of task completion, qualification, language skills, professional experience.

Processing and reporting the data marked with* and to the first instance tax authorities is compulsory under Annex 1 Article 3 of Act No. CL of 2017.

The purpose of data processing is to fulfill the legal obligations.

The Data Controller keeps records for 5 years after the end of the calendar year of the Colleague leaving, with the obligation not to discard employment, payroll and social security records.

The activity and process of data processing are as follows:

- a. The Data Controller informs the data subject that it has a statutory duty to report to the state tax and customs authorities regarding the mandatory data and the data subject acknowledges it in writing.
- b. If the data subject does not wish to acknowledge the fulfillment of this legal obligations and does not give his/her consent to it, no employment, simplified employment or assignment work relationship can be established.
- c. After the consent is given, the data subject i.e. the future Colleague shall sign a contract on an employment, simplified employment or assignment work relationship with the Data Controller who will store the contract according to the Records Management Rules.
- d. To comply with the statutory obligations the Data Controller shall inform i.e. transfer the data required to the competent first instance state tax and customs authority by electronic means or by means of a form for this purpose, together with its own name,

official name, address, domicile, place of residence, name of legal predecessor and tax number.

The Data Controller must make sure that the personal data of its employees shall only be processed by Colleague(s) whose involvement is indispensable. In case fulfilling the tasks of a colleague does not necessitate to be aware of the data of the employees of the Data Controller he/she must not learn them.

A colleague, in particular, if he/she is a data administrator at the same time (that is, the head of the organizational unit where the law or the internal rules regulate the processing of the data or where the data are generated) must get acquainted with the GDPR regulation, other related internal regulations, orders not later than the first day of work. Colleagues are obliged to act as instructed by the data administrator.

Data are sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

2. Data processing in case of the Data Controller's internal training sessions

The Data Controller processes the data entered during the internal training based on the statements made here, given that the Colleagues receive training on the basis of the fire protection, safety and data protection regulations in force at the Data Controller for which attendance sheets and minutes are used.

The legal basis for data processing: it is mandatory by law (e.g. fire safety, work safety, job training, etc.) or the legitimate interest of the Data Controller (e.g. data protection training). It is a legitimate interest of the Data Controller to ensure that the knowledge and skills of the Employees are constantly evolving to deliver a growing quality of work.

Scope of data subjects: All colleagues of the Data Controller.

Scope and the goals of the data processing related to the log book:

Subject / topic of the training	identification
list of attendants	identification
signature of Colleagues participating	identification, evidencing
date and time of training	identification
name and signature of lecturer	identification

Scope and the goals of the data processing related to the individual training:

name of Colleague	identification
subject / topic of the training	identification
date and time of training	identification

name and signature of lecturer

identification

Scope and the goals of the data processing related to the certificates and examinations of Colleagues:

name of Colleague

identification

number of certificate / exam

identification , evidencing, reporting to state tax and customs authorities

copy of certificate / exam

evidencing, if required by authority (the Data Controller shall not store copies otherwise)

The purpose of the data processing is to fulfill the legal obligations, to prove the professional qualification, and to support the development and follow the education of the Colleagues.

The activity and process of data processing in case of internal training are as follows:

- a. The Data Controller announces the time and dates of the internal training, and the colleague is obliged to attend the internal training.
- b. The Data Controller takes an attendance sheet or other document of probative value of the training session signed by the Employee.
- c. If required by the training the colleague stands an exam, the result of which is recorded by the Data Controller.

The activity and process of data processing related to the exams and certificates issued for a colleague by a third party:

- a. Data subject presents the certificate, document, proof of the exam taken to the Data Controller
- b. Data Controller verifies the authenticity of the document and records its number
- c. If a labor or other authority is entitled to check the existence of a document at the workplace, the Data Controller may, after getting the consent of the data subject, make a copy of the document that it is required to store in accordance with the requirements of data security. Otherwise, the Data Controller shall not make a copy of the documents.

Duration of the data processing: log book of the safety, security and fire safety training is kept by the Data Controller for 3 years, the colleague's personal training journal, certificates, exams (and, if necessary, copies) are processed during the legal relationship.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

3. Data processing related to accidents at work

In the unwanted event that the data subject Colleague has an accident when coming to work or while working, Data Controller shall, with the assistance of the data subject if possible, take an accident report and a service request for the insurance company and transmit personal and special data to the health care provider.

The legal basis for data processing is the need to protect the health and life of the data subject.

Scope of data subjects: All colleagues who suffer an accident.

Scope of the data processed in relation with the accident report:

name of the data subject injured* ¹¹	shall be used for the accident report
name at birth*	shall be used for the accident report
place of birth*	shall be used for the accident report
date of birth*	shall be used for the accident report
mother's name*	shall be used for the accident report
permanent address*	shall be used for the accident report
telephone number*	shall be used for the accident report
date and time of the accident*	shall be used for the accident report
place of the accident*	shall be used for the accident report
short description of the accident*	shall be used for the accident report
short statement of the eyewitness	shall be used for the accident report
name of the person who caused the accident (if applicable)	shall be used for the accident report
address, phone number in case the injured received first-aid, statement of the person who provided it	shall be used for the accident report
if ambulance was called, name of the person who called and the time of the call	shall be used for the accident report

The purpose of the data processing is to identify the persons concerned, to maintain contacts and to take legal action regarding the accident.

The activity and process of the data processing are as follows:

- a. After the accident has occurred, the Data Controller shall immediately record an accident report with the active involvement of the data subject injured, the data subject witness(es), the data subject who caused the accident (if applicable), with the data specified above.
- b. The Data Controller names the insurance company, prepares a service request and sends the document containing the data to the insurance company.
- c. The Data Controller shall make a copy of both the accident report and the service claimant and shall store them in accordance with the Records Management Rules.

¹¹ With respect to the data marked with *, the data controller draws attention to the fact that if the data subject does not provide them to the data controller, it will refuse to render the related service.

- d. The Data Controller maintains a contact with the data subject injured, and, if necessary, with the data subject witness and the person(s) causing the accident, and informs them about the facts, legal and other actions.

Data Controller transmits the data available to the health care provider the legal basis being the life protection of the data subject.

Data Controller transmits the accident report taken about the accident of the colleague as follows:

- a) If the accident causes work incapacity of 1 to 3 days:
 - i) the work accident report shall be sent only to the injured person and the social security paying office, in the absence thatof to the competent health insurance fund (branch office)
- b) If the accident causes work incapacity of longer than 3 days, the report shall be sent to:
 - i) the injured; in case of his/her death to his/her relatives;
 - ii) about death or a work accident leading to incapacity for work exceeding three days: to the occupational safety inspectorate in charge;
 - iii) in the case of a mission abroad, foreign service or labour-hire, to the labor inspectorate competent according to the Hungarian employer's domicile;
 - iv) the National Health Insurance Fund, the social insurance paying party, and, failing this, the competent health insurance administration body;
- c) In case of labour-hire or secondment to the lender, seconding employer.

When submitting a report on serious work accidents to the labor inspectorate, the full documentation of the employer's accident investigation must be enclosed, in particular

- (a) the minutes of the hearings;
- (b) certificate of the professional qualification;
- (c) document certifying the data processing entitlement;
- (d) medical certificate;
- (e) document of the installation;
- (f) a documentary record of the periodic safety review;
- (g) the documentary evidence of the risk assessment;
- (h) photographs and video recordings;
- (i) the relevant parts of the internal regulations.

The legal basis for the transfer of data is a statutory obligation (or if it is not applicable, the interest or the vital need of the data subject).

Duration of the data processing: 5 years from date of the report.

Data are not sent to third parties.

The way of data processing: electronically, manually.

Source of data: directly from the data subject.

XI. Rights of the data subjects, enforcement of rights, remedies

The data subject must be clearly and thoroughly informed of all the facts related to the processing of his or her data, in particular the purpose and legal basis of the data processing, the Data Controller and the person entitled to process them, and the duration of the data processing.

The information should also include the rights and remedies available to the data subject.

Data subjects are entitled to the following rights:

Data subject may apply to the School for

- information on the processing of his/her personal data,
- correcting his/her personal data if they do not comply with the reality and if the real data are available,
- the erasure or locking of his/her personal data,
- limiting the processing of the personal data to certain cases.

The data subject may object to the processing of his or her personal data

- if the processing or transmission of personal data is only necessary to comply with the legal obligation of the Data Controller or to enforce the legitimate interest of the Data Controller, data receiver or a third party, except in the case of mandatory data processing;
- if the use or transfer of personal data is done for direct business acquisition, polling or scientific research;
- in other cases specified by law.

The School shall examine the protest within the shortest time but not later than 15 days after the submission of the application, make a decision on its merits and inform the data subject in writing.

In the event of a denial or restriction, the School can not guarantee the service concerned and is not liable to provide the service. If the personal data do not comply with the reality and the personal data corresponding to the reality are available to the Data Controller, the personal data will be corrected by the Data Controller.

If so requested by the data subject, the School shall provide information on the data processed by the Data Controller or the data processor which they entrust, sources, purpose, legal basis, duration of the data processing, the name and address of the data processor and its activity related to the data processing, and, in the case of the transfer of the personal data, the legal basis and the addressee of the transfer.

Within 30 days of the receipt of the application, the School shall provide the requested information in writing, in an understandable form.

Information is free of charge if the applicant for information has not yet submitted an information request for the same data field in the current year. In other cases, a cost reimbursement of HUF 1000 / information may be charged. The cost reimbursement already paid will have to be refunded if the data are handled unlawfully or the request for information has led to rectification.

The School may only refuse the information in the cases specified in the Information Act. In the event of denial of information, the School shall notify the data subject in writing of the provision of the Act the refusal is based on. In case of denial of information, the School also informs the data subject of the possibility of appeal to the court and to the National Data Protection and Information Authority. The School shall be liable for any damage caused to others by the unlawful processing of data or breach of the requirements of data security. Towards the data subject the School as a data controller is liable for any damage caused by the data processor as well. The Data Controller is exempt from liability if they prove that the damage was caused by an unavoidable cause outside the scope of data processing. There is no need to reimburse the damage in so far as it is due to the intentional or gross negligence of the injured party.

The data subject may turn to the court in case of violation of his or her rights. The Data Controller must prove that the data processing is in compliance with the law. The trial is governed by the jurisdiction of the Civil Service Tribunal. The case may be initiated before the tribunal of the domicile or place of residence of the data subject, according to his / her choice.

Based on the recommendation of the National Data Protection and Information Authority, it is recommended that the data subject should submit his / her complaint as regards the data processing to the Data Controller (in this case, the School) in the first instance. Complaints can be reported by e-mail at dataprotection@ibs-b.hu or at the postal address of the School.

Right to court:

In the event of violation of his / her rights, the Data Subject may turn to court against the Data Controller from the date of notification of the decision or - if the School fails within the time limit specified in the Information Act - within 30 (thirty) days from the last day of the deadline. The court shall proceed out of turn.

Procedure of the Data Protection Authority:

Panasszal a Nemzeti Adatvédelmi és Információszabadság Hatóságnál lehet élni:
Név: Nemzeti Adatvédelmi és Információszabadság Hatóság

Complaint can be filed with the National Data Protection and Information Authority:

Name: National Data Protection and Freedom Authority

Seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mail address: 1530 Budapest, Pf.: 5.

Phone: 06-1-391-1400

Telefax: 06-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

School Data Protection Officer:

Rita DOOR

Mail: 1031 Budapest, Záhony u. 7.

Phone: +36 1 5888614 Call time: Monday - Friday: 9:00-12:00

E-mail: dataprotection@ibs-b.hu

This prospectus was published by the IBS International Business School on its website (www.ibs-b.hu) in Hungarian and English. The School may modify this Prospectus on Data Processing unilaterally.

The current information is available at the School's website.

Budapest, 22 May 2018

IBS International Business School