

Privacy Policy

In Brief

We only collect and process personal data in accordance with laws and regulations. We take all necessary measures to store data securely. Personal data is only shared with third parties with the individual's consent.

We provide information about stored data upon written request: info@onlinemagyariskola.com

Requests for deletion or modification of personal data can be sent to the same address: info@onlinemagyariskola.com

Introduction

Online Magyar Iskola (Online Hungarian School, Inc.)

318 Cedar Creek Dr, State Road, NC 28676, USA

Tax ID: 86-3037095, registered with the Department of the Secretary of State, North Carolina (hereinafter referred to as the “**data controller**”) adheres to the following:

Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information states that the data subject (in this case the website user, hereinafter referred to as the “**user**”) must be informed prior to the start of data processing whether the data processing is based on consent or is mandatory.

The data subject must be clearly and thoroughly informed before data processing begins about all facts related to the handling of their data, including especially the purpose and legal basis of data processing, the identity of the person authorized to process and manage the data, and the duration of the processing. The information must also include the data subject's rights and the options for legal remedy related to data processing.

This Privacy Notice applies to the data processing of the following websites:

<https://www.onlinemagyariskola.com/>

Amendments to this notice become effective upon being published at the above address. Legal references have been included behind certain sections of this document.

Definitions (based on Article 4 of 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, repealing Directive 95/46/EC - General Data Protection Regulation or GDPR)

1. “**personal data**” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to

an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person;

2. **"processing"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;
3. **"restriction of processing"** means the marking of stored personal data with the aim of limiting their processing in the future;
4. **"profiling"** means 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 analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements;
5. **"pseudonymization"** means the processing of personal data in such a manner that the 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 organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
6. **"Filing system"**: any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized, or dispersed on a functional or geographical basis;
7. **"Controller"**: a natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
8. **"Processor"**: a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller;
9. **"Recipient"**: a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
10. **"Third party"**: a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the

direct authority of the controller or processor, are authorized to process personal data;

11. **“Data subject’s consent”**: any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
12. **“Personal data breach”**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed;
13. **“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;
14. **“Biometric data”**: personal data resulting from specific technical processing relating to the physical, physiological, or behavioral characteristics of a natural person which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
15. **“Health data”**: 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;
16. **“Main establishment”**:
 - a. for a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter has the power to have such decisions implemented – in which case that other establishment shall be considered the main establishment;
 - b. for a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if it has no central administration in the Union, the establishment in the Union where the main processing activities in the context of the activities of an establishment of the processor take place;
17. **“Representative”**: a natural or legal person established in the Union who, designated in writing by the controller or processor pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation;
18. **“Enterprise”**: a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in economic activity;
19. **“Group of undertakings”**: a controlling undertaking and its controlled undertakings;
20. **“Binding corporate rules”**: personal data protection policies adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in

- one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;
21. **“Supervisory authority”**: an independent public authority which is established by a Member State pursuant to Article 51;
 22. **“Concerned supervisory authority”**: a supervisory authority which is concerned by the processing of personal data because:
 - a. the controller or processor is established on the territory of the Member State of that supervisory authority;
 - b. data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or
 - c. a complaint has been lodged with that supervisory authority;
 23. **“Cross-border processing”**:
 - a. processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union; or
 - b. processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State;
 24. **“Relevant and reasoned objection”**: an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;
 25. **“Information society service”**: a service as defined in point (b) of Article 1(1) of Directive (EU) 2015/1535;
 26. **“International organization”**: an organization and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

Legal Basis for Data Processing (Based on Act CXII of 2011 on Informational Self-Determination and Freedom of Information, Section 5)

Personal data may be processed if:

- a. it is ordered by law or — based on an authorization by law, within the scope defined therein and not qualifying as special or criminal personal data — by a local government decree for a purpose based on public interest;
- b. in the absence of the conditions specified in point (a), the data processing is absolutely necessary for the performance of the data controller’s tasks defined by law, and the data subject has given explicit consent to the processing of personal data;

- c. in the absence of the conditions specified in point (a), the processing is necessary and proportionate for the protection of the vital interests of the data subject or another person, and for the prevention or elimination of a direct threat to life, physical integrity, or property;
- d. in the absence of the conditions specified in point (a), the personal data have been explicitly made public by the data subject, and the processing is necessary and proportionate to the achievement of the processing purpose.

Lawfulness of Processing (Based on Article 6 of Regulation (EU) 2016/679 – General Data Protection Regulation)

Processing shall be lawful only if and to the extent that at least one of the following applies:

- a. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c. processing is necessary for compliance with a legal obligation to which the controller is subject;
- d. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, particularly where the data subject is a child.

The provision under point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks.

Information to Be Provided

1. Based on Section 5(1) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information the following information must be specified for the operation of the website:
 - a. the fact of data collection,
 - b. the scope of data subjects,
 - c. the purpose of data collection,
 - d. the duration of data processing,
 - e. the persons of potential data controllers authorized to access the data,
 - f. a description of the rights of data subjects related to data processing.
2. The Fact of Data Collection and Scope of Personal Data Processed:

- a. Email address of the registrant
 - b. Full name
 - c. Address (country, city)
 - d. Child's date of birth
 - e. Other data requested:
 - Important information about the child (e.g., what motivates them, attitude toward learning Hungarian, hobbies, etc.)
 - Photograph of the child
3. Scope of Data Subjects:
- All users registered on the website.
4. Purpose of Data Collection:
- a. Email address:
 - for registration purposes
 - for customer communication
 - b. Full name (first and last):
 - for registration purposes
 - for customer communication
 - c. Address (country, city):
 - to determine time zone
 - for customer communication
 - d. Child's date of birth:
 - to determine the child's age
 - e. Other personal data:
 - Important information about the child: to get to know the child better and assist the teachers
 - Photograph of the child: for easier identification
5. Duration of data processing, data deletion deadline: Personal data will be deleted immediately upon cancellation of registration. **Exception:** Accounting records, as per Section 169 (2) of Act C of 2000 on Accounting, must be retained for 8 years. *All accounting documents that directly or indirectly support bookkeeping (including general ledger accounts, analytical and detailed records) must be preserved in a readable format and in a retrievable manner, based on accounting references, for a minimum of 8 years.*
6. Persons authorized to access the data: Personal data may be processed by the employees of the data controller, in compliance with the above principles.
7. Rights of data subjects related to data processing:
- a. The following data can be modified on the website:
 - full name
 - address (country, city)
 - child's date of birth
 - important information about the child
 - photograph of the child

- b. Data subjects may request the deletion or modification of their personal data by:
- Postal mail: *318 Cedar Creek Dr, State Road, NC 28676, USA*
 - Email: *info@onlinemagyariskola.com*
8. Legal basis of data processing: The legal basis of data processing is the user's consent, in accordance with Section 5 (1) of the Information Act, and Section 13/A (3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (hereinafter referred to as: E-Commerce Act):
- The service provider may process those personal data that are technically essential for providing the service. When all other conditions are the same, the service provider must choose and operate the tools used in connection with the information society service in such a way that personal data are processed only when it is strictly necessary for providing the service and for achieving other goals defined by the law – and even in such cases, only to the necessary extent and duration.*
9. Hosting service provider (website host):
- Name: Bluehost – Endurance International Group
Address: 10 Corporate Drive, Suite #300, Burlington, MA, 01803
Email: legal@bluehost.com
Phone: +1 801-765-9400
Privacy Policy: <https://www.endurance.com/privacy/privacy>

Data security and data subjects' rights (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)

The processing of personal data must be lawful and fair. It must be transparent to natural persons how their personal data is collected, used, accessed, or otherwise processed, and to what extent. The principle of transparency requires that information and communication related to personal data processing be easily accessible, clearly and plainly worded, and easy to understand. This principle applies in particular to providing data subjects with information about the identity of the data controller and the purpose of data processing. It also applies to further explanations needed to ensure that data subjects' personal data are processed fairly and transparently. Data subjects have the right to obtain confirmation and detailed information regarding their personal data being processed.

Natural persons must be informed about the risks, rules, safeguards, and rights related to data processing, and about how they can exercise their rights in this context. The specific purposes of personal data processing must be explicitly defined, lawful, and determined at the time of data collection. Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed. In particular, it must be ensured that personal data are stored for the shortest possible period. Personal data may only be processed if the purpose of the processing cannot reasonably be fulfilled by other means. To ensure

that the retention of personal data is limited to the necessary period, the data controller shall establish deletion deadlines or conduct regular reviews. All reasonable steps must be taken to correct or delete inaccurate personal data. Personal data must be processed in a manner that ensures appropriate security and confidentiality, including protection against unauthorized access to or use of personal data and the systems used for processing.

To ensure that the processing of personal data is lawful, it must be based on the data subject's consent, or on another lawful basis defined by legislation – whether under this Regulation or under other Union or Member State laws referenced by this Regulation – including compliance with legal obligations applicable to the data controller, performance of a contract to which the data subject is party, or steps taken at the request of the data subject prior to entering into a contract.

Newsletter Distribution (*Section 6 of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities*)

1. Unless otherwise provided by specific legislation, advertisements addressed to natural persons as recipients of advertising messages through direct contact methods (hereinafter: *direct marketing*), in particular by electronic mail or other equivalent individual means of communication, may only be delivered – except as provided in paragraph (4) – if the recipient has given their prior, explicit, and unambiguous consent.
2. A declaration of consent may be made in any form that includes the name of the individual providing it and – if the advertisement in question may be addressed only to persons of a specific age group – their place and date of birth. It must also specify the categories of personal data the individual consents to be processed, and express that the consent is voluntary and based on appropriate prior information.
3. Consent granted under paragraph (1) may be withdrawn at any time without restriction, justification, or cost. In such cases, the individual's name and any other personal data must be promptly deleted from the registry referred to in paragraph (5), and no further advertisements may be sent to them under the provisions of paragraph (1).
4. Advertising materials may still be sent via direct marketing to natural persons without prior explicit consent, as provided in paragraph (4), provided that the advertiser and advertising service provider ensure that the recipient may object to further communications at any time, without restriction or cost. In the event of such an objection, no further advertising may be sent to that person via direct marketing.
5. The advertiser, advertising service provider, or the publisher of the advertisement must maintain a registry of the individuals who have provided consent under paragraph (1). The personal data in this registry may only be processed in accordance with the consent given and only until the consent is

revoked. Data may only be transferred to third parties with the prior explicit consent of the data subject.

6. It must be possible to submit the revocation of consent or an objection to future advertising either by post or electronic mail, in a way that allows the individual to be clearly identified.
7. Any advertisement delivered under paragraphs (1) or (4) must clearly and prominently inform the recipient of the address or other contact information where they may submit a withdrawal of consent or lodge an objection to the delivery of advertisements. Furthermore, under paragraph (4), if such an advertisement is sent to the same recipient by the same advertiser for the first time after October 1, 2009, it must include a reply form that enables the recipient to opt out by returning a pre-addressed, postage-paid, trackable mail item.
8. A request to obtain the consent specified in paragraph (1) may not contain advertising, except for the name and identification of the business making the request.
9. For the purposes of this Section, a targeted advertising postal item is defined as a postal item containing only advertising, promotional, or commercial content, sent to at least 500 recipients at once, and identical in content (except for the name, address, or other non-substantive personal details of the recipients), and which qualifies as an unclassified postal item under the relevant postal legislation.

Cookie Management (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 – General Data Protection Regulation)

By using the website, the user acknowledges the following:

Natural persons may be associated with online identifiers provided by their devices, applications, tools, and protocols, such as IP addresses, cookie identifiers, and other identifiers such as radio frequency identification tags (RFID). These identifiers may leave traces that, when combined with unique identifiers and other information received by servers, can be used to create profiles of individuals and to identify them.

Right to an Effective Judicial Remedy (Article 79 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 – General Data Protection Regulation)

1. Without prejudice to any available administrative or non-judicial remedy – including the right to lodge a complaint with a supervisory authority pursuant to Article 77 – every data subject shall have the right to an effective judicial remedy where they consider that their rights under this Regulation have been infringed as a result of the processing of their personal data in non-compliance with this Regulation.
2. Proceedings against a data controller or data processor shall be brought before the courts of the Member State where the data controller or processor has an

establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has their habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

In the event of a potential infringement, a complaint may be lodged with the Hungarian National Authority for Data Protection and Freedom of Information:

Nemzeti Adatvédelmi és Információszabadság Hatóság - Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

H-1125 Budapest, Szilágyi Erzsébet fasor 22/C, Hungary

Mailing address: H-1530 Budapest, P.O. Box: 5

Phone: +36-1-391-1400

Fax: +36-1-391-1410

Email: ugyfelszolgalat@naih.hu

Right to Compensation (Article 82 of Regulation (EU) 2016/679 of the European Parliament and of the Council – General Data Protection Regulation)

1. Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered.
2. Every controller involved in processing shall be liable for the damage caused by processing which infringes this Regulation. A processor shall be liable for the damage caused by processing only where it has not complied with obligations of this Regulation specifically directed to processors or acted outside or contrary to lawful instructions of the controller.
3. The controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.
4. Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and are, under paragraphs (2) and (3), responsible for any damage caused by processing, each controller or processor shall be held jointly and severally liable for the entire damage in order to ensure effective compensation of the data subject.
5. Where a controller or processor has paid full compensation for the damage suffered, it shall be entitled to claim back from the other controllers or processors involved in the same processing that part of the compensation corresponding to their part of responsibility for the damage in accordance with paragraph (2).
6. Proceedings for exercising the right to receive compensation shall be brought before the courts competent under the law of the Member State referred to in Article 79(2).

References (English Translation):

In preparing this information notice, we have taken the following legislation into account:

- Act CXII of 2011 – on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: "Infotv.")
- Act CVIII of 2001 – on Certain Issues of Electronic Commerce Services and Information Society Services (especially Section 13/A)
- Act XLVII of 2008 – on the Prohibition of Unfair Commercial Practices against Consumers
- Act XLVIII of 2008 – on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (particularly Section 6)
- Act XC of 2005 – on the Freedom of Electronic Information
- Act C of 2003 – on Electronic Communications (specifically Section 155)
- Opinion No. 16/2011 on the EASA/IAB Best Practice Recommendation on Online Behavioural Advertising
- 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 (General Data Protection Regulation – GDPR)