

# DATA PROCESSING POLICY

## 1. GENERAL RULES

**Data Controller: Coachingmatrix Kft. (2800 Tatabánya, Búzavirág utca 4. company registration number: 11-09-028806; tax number: 26616265-2-11, e-mail address: [info@coachingmatrix.hu](mailto:info@coachingmatrix.hu))**

### **Purpose and scope of the Policy**

The purpose of this Policy is to ensure that the principles of data protection and data security are respected and to prevent unauthorised access, alteration and unauthorised disclosure of data.

### **Basic concepts and principles of data protection**

#### **Personal data**

'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, 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.

#### **Controlling and processing data**

"Controlling" means any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Coachingmatrix Kft. will keep the personal data it receives as a trade secret.

#### **Principles of data management**

Data processing must be lawful, fair and transparent, and only data strictly necessary for the purpose for which it is collected may be collected and only until the purpose is fulfilled. The processing of data must be carried out in such a way as to ensure adequate security of personal data by using appropriate technical or organisational measures.

#### **Rules for data processing**

Personal data may be processed by Coachingmatrix Kft. if

- the data subject has given his or her consent
- the processing is necessary for the performance of a contract
- processing is necessary for the performance of legal obligations of Coachingmatrix Kft.

- processing is necessary in order to protect the vital interests of the natural person concerned
- processing is necessary for the purposes of the legitimate interests pursued by Coachingmatrix Kft.

Personal data of children cannot be processed, not including processing necessary to comply with a legal obligation!

### **Transmission on request**

A request for disclosure from an external body or an individual may only be complied with if the data subject gives his or her written consent or if the transfer is required by law.

The facts relating to the provision of the data in response to the request and the circumstances surrounding the request shall be documented. The document shall contain the following information:

- the name and postal address of the body or person making the request
- the legal basis of the request for data or the declaration of the person concerned
- the date of the request for data
- the name of the data controlling operation on which the data are based
- the identity of the department which is providing the data
- the data subjects concerned
- the scope of the data requested
- the means of transmission of the data

The document shall be kept for five years.

### **Data transmission abroad**

In the case of processing that may involve a transfer of data outside the European Union, the data subjects' attention should be drawn to this fact before the data are recorded.

Facts and circumstances relating to the provision of data abroad shall be documented and the document kept for five years.

### **Disclosure of personal data**

Disclosure of personal data processed by Coachingmatrix Kft. is prohibited, unless required by law.

### **Data Security Policy**

In order to enforce the data security rules, the necessary measures must be taken to ensure the security of personal data, both manually processed and stored and processed on computer.

### **Data stored on computer**

In order to ensure the security of personal data stored on a computer or network, the Data Controller shall implement appropriate technical and organisational measures to ensure a level of data security appropriate to the level of risk. Please note, however, that the transmission of

data over the Internet and electronic storage can never be 100% secure in the event of an attack.

The Data Controller undertakes to ensure the security of the data, to take technical and organisational measures and to establish procedures to ensure that data recorded, stored or processed are protected and to prevent their destruction, unauthorised use or unauthorised alteration. Furthermore, it undertakes to require any third party to whom it may transfer or disclose the data to fulfil its obligations in this respect.

Electronic storage location: private server  
Data processor: MediaSales Kft.

## **Rights of the data subject and their enforcement**

### Right to prior information

The data subject has the right to be informed of the facts and information relating to the processing before the processing starts.

### Right of access

The data subject may ask the competent administrator for information about the processing concerning him or her and have access to it. Access shall be granted in such a way that the data subject has no access to the personal data of another person. Responsible person: competent administrator.

### Right to rectification

In the event of a change of data or of the detection of an inaccurate recording of data, the data subject may request the rectification or correction of his/her personal data. In the event of a verified change of data or a verified incorrect recording of data, the Data Controller shall correct the incorrect data within two working days.

### Right to erasure

In case of processing based on non-compulsory data provision, the data subject may request the erasure of his/her processed data. The lawfulness of the deletion should be subject to the opinion of a lawyer. Where erasure is mandatory under the applicable law, erasure must be carried out within five working days and reasonable steps, including technical measures, must be taken to ensure that the data are erased from the records of Coachingmatrix Kft. and from the records of any other Data Controller.

### Right to restriction of processing

The data subject may request the restriction of the processing of his or her data where there are adequate grounds for doing so. The opinion of a lawyer should be sought as to whether the restriction is justified. Where erasure is mandatory under the applicable legislation, the restriction must be carried out within three working days.

### Right to data portability

In the case of data stored on a computer medium, the data subject shall have the right to obtain the personal data relating to him or her which he or she has made available to a controller in a commonly used machine-readable format, where the processing is based on voluntary consent or where it has been provided for the performance of a contract with a private individual.

#### Right to object

Where the processing is necessary for the legitimate interests of Coachingmatrix Kft., the data subject has the right to object to processing. In this case Coachingmatrix Kft. will assess whether there are compelling legitimate grounds for the processing which override the rights of the data subject. If the objection is justified, the data shall be erased from the records of Coachingmatrix Kft. and from the records of any other controllers.

#### Automated decision-making in individual cases, including profiling

The data subject shall have the right not to 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.

#### Right to lodge a complaint with the supervisory authority

In the event of a breach of his or her rights in relation to data processing, the data subject may contact the Executive Director.

In the event of unlawful processing, a court action may be taken or a complaint may be lodged with the National Authority for Data Protection and Freedom of Information:

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Postal address: 1534 Budapest, PO Box: 834

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

#### Information for the data subject in the event of a data breach

If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the data subject of the personal data breach without undue delay.

In case of a data breach, it will be investigated within 24 hours.

The investigation shall cover

- a. the time and place when the incident occurred,
- b. the circumstances and effects of the incident,
- c. the scope and quantity of data compromised during the incident,
- d. the number of persons affected by the compromised data,
- e. a description of the measures taken to remedy the incident,
- f. a description of the measures taken to prevent, prevent, mitigate or reduce the damage.

## 2. RULES ON CERTAIN DATA PROCESSING

An employer may carry out employee aptitude tests as prescribed by an employment regulation, in particular by the Labour Code, and may also carry out aptitude tests and other tests which are not prescribed by an employment regulation but are necessary for the exercise of a right or the performance of an obligation defined in the employment relationship.

The employer may use examinations, series of questions and tests to check fitness for work, suitability for the performance of the job, readiness for the job both before the employment relationship is established and during the employment relationship. It may be necessary to assess the skills and abilities of individuals in the course of organisational development or in order to determine individual development tasks.

### **Entering into a contract**

In addition to the personal data, tax number, bank account, telephone number and e-mail address of natural persons entering into a contractual relationship with the Data Controller, the contract may only contain such data as are strictly necessary for the performance of the contract. In any event, any processing of data exceeding the above must be justified.

The data provided by the data subject when concluding a contract may only be used for the exercise of rights and obligations arising from the contract and access to the data may only be authorised for such purposes.

In the case of a contract with a legal person, data from public registers accessible to all may be processed. Where the legal person designates as a contact person an individual who is not listed in the public register, the name, position, telephone number and e-mail address of such individuals may be included in the contract and processed and stored for the purposes of day-to-day contact, on the basis of the voluntary provision of data by the legal person.

Data processed: personal data, tax number, bank account number, telephone number, e-mail address, contact name, position, telephone number and e-mail address,

Purpose of processing: conclusion and performance of a contract between the parties

Legal basis for processing: Accounting Act,

Duration of processing: 10 years

Transmission of data: auditor, lawyer

### **Registration**

The Data Controller, in the course of its coaching, training, business development, business consultancy services, as an independent Data Controller, processes the data strictly necessary for the identification of the Data Subject and for the maintenance of contact.

The use of the measurements requires registration and subscription.

Scope of the data processed:

General data: first name, surname, e-mail address, gender, date of birth, education.

Employer data: Company (employer), department, position, salary range, how long you have been working for the company, what training you have attended.

Purpose of data processing: coaching, training, consultancy services, HR process support, business development, business consulting, organisational development, strategic planning

Last name, first name and date of birth are required for identification purposes.

The e-mail address is required in order to send the measurement and the evaluation

We need the name of the employer to complete the contract.

We need the date of birth, education, position, salary range, length of employment in order to carry out analyses on specific groups of employees (for example, how many members of a group have a certain characteristic).

Legal basis for processing:

The data subject's consent (Article 6(1)(a) GDPR), which can be provided on the entry form.

If the contracting party is the Data Subject's employer, it is the duty and responsibility of the contracting partner of Coachingmatrix Kft. to inform the Data Subject of this Privacy Policy and to obtain the Data Subject's consent in a verifiable manner and to provide it to the Data Controller.

Duration of processing: for surname, first name and e-mail address, until the termination of the contract.

All other personal data indicated above will be anonymized after the deletion of the surname, first name and e-mail address, they will no longer be linked to a specific person and will lose their personal data character. The anonymised data will be used for research and statistical purposes.

Access: Authorised employees of Coachingmatrix Kft. may access the data in the database. In the event of a technical problem, an IT professional may view data on a random basis during troubleshooting and administration.

### ***E-mail***

After registration, a one-time confirmation e-mail will be sent. If the contracting party is the employer of the data subject, the person designated by the employer is authorised to manage the settings via the Coachingmatrix Kft. system.

Occasionally, we may send you information about the service, such as information about possible service dropouts or the expiry of the deadline for completion.

Other personal data that the Data Subject may provide in electronic mail or in other forms are not required by the Data Controller for the performance of the contract and for the maintenance of contact and are not recorded in a filing system.

We ask Data Subjects not to provide further personal data in electronic mail. If it happens, we will delete them in accordance with the deletion policy for electronic mail.

### ***Measurement types***

The information provided by the data subjects on their opinions about their own characteristics, their time management habits and their life position (relationship with each other) is processed on the basis of a separate interest-weighting test.

The information collected allows us to carry out scientific research and to improve our service on the basis of the information and the conclusions and statistical analyses drawn from it.

#### **Scope of data processed:**

- Answers to questions
- Session ID
- IP number
- Time of response

The Controller processes the following personal data in the context of the Individual Trait Set Measurement: the data subject's opinion about his/her own traits.

The Controller processes the following personal data in the context of the individual time management measurement: the time management habits of the data subject.

The Data Controller processes the following personal data in the context of the individual wellbieng measurement: responses concerning life position (relationship with peers).

#### **Purpose of the processing:**

The questions asked during the measurement are only for the purpose of data processing, no special data (e.g. health data) are collected. The results of the mapped habits and opinions can also be considered as personal data, for example, they may indicate values, negative or positive attitudes, good or bad time management, but the measurements cannot be used to form complex psychological opinions.

**Legal basis for processing:** data subject's consent, which can be given on the entry form.

**Duration of processing:** duration of the contract

**Access:** Authorised employees of Coachingmatrix Kft. may access the data in the database. In the event of a technical problem, an IT professional may view data on an incidental basis in the course of his/her troubleshooting and administration activities

### ***Feedback after measurements have been taken***

The post-measurement feedback contains the name of the Data Subject, the position, the type of module, the time of completion, the aggregated answers given, and, if necessary, the actions and directions for improvement.

In order to comply with data protection provisions, the feedback will only contain the aggregated answers provided by the Data Subject and will not include any personal data. It will, however, include suggestions, i.e. development needs, tasks to be carried out, training, coaching, courses, etc.).

In the case of employee groups, we can also provide group aggregates (e.g. how many members of the group have a given characteristic), but these can no longer be linked to a specific person and are therefore not considered personal data.

### ***Website operation***

The terms and conditions for the operation of the website are set out in the privacy notice on the website.

### ***Sending out newsletters***

Advertisements may be communicated to natural persons as the addressee of the advertisement by means of direct contact (direct solicitation), in particular by electronic mail or other equivalent means of individual communication, with the exception of the provisions of Act XLVIII of 2008, only if the addressee of the advertisement has given his/her prior, clear and express consent.

The Data Controller operates a newsletter. The newsletter is sent by the Data Controller at specified intervals to the e-mail addresses that are included in the database of voluntary subscribers.

Purpose of the processing: the purpose of processing personal data is to carry out direct marketing activities related to the activities of the Data Controller, sending newsletters, current offers on a regular or periodic basis.

By providing an email address, each User also assumes the responsibility to ensure that the email address provided is the only one from which he/she will receive services. With regard to this assumption of responsibility, any liability for accessing the service from a given email address shall be borne solely by the User who registered the email address.

In any case, the Data Controller shall ensure the right to prior information and the right to volunteer.

The user of the e-mail address concerned may unsubscribe directly from the newsletter at any time, free of charge.

The Data Controller reserves the right, however, to send a request to an e-mail address that does not constitute personal data. In this case, the following information will be sent in the newsletter:

*"The e-mail address to which this newsletter is sent is taken from the public register, in which the address is indicated as the electronic contact details of the company. The data relating to the representation of the company is therefore not personal data, even if it (also) contains the name(s) of the owner or representative of the company. Since pursuant to Article 6 (1) of Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities, no prior consent is required for direct advertising using electronic mail or other equivalent means of communication in connection with the above data, the provision on prior consent of Act CXII of 2011 does not apply to this letter. However, if you do not wish to receive any further correspondence from us, please [click here to unsubscribe](#)."*

Purpose of the processing: to communicate through marketing communication channels by sending newsletters to subscribing e-mail addresses.

Data processed: name (first and last name), e-mail address, date of consent.

Legal basis for processing: data subject's consent.

Time limit for processing: until the end of the operation of the newsletter service, but if the data subject requests the deletion of his/her data (unsubscribes from the newsletter), we will delete it within 8 days of the request for deletion.

The Data Controller may from time to time carry out market research and public opinion polls.

The purpose of processing personal data is to understand market trends and user needs.