

DATA PROCESSING INFORMATION

INTERNATIONAL SCHOOL OF DEBRECEN, as data controller (hereinafter: ISD/(data) controller), is committed to the protection of the personal data of data subjects (hereinafter: visitors or data subjects).

The ISD will treat personal information confidentially and take all security, technical and organizational measures that guarantee the security of the data, and will review these measures from time to time.

The purpose of this informative is that the ISD discloses its data management principles and data protection and data management policy, which the ISD recognizes as binding on itself and which is based on the Data Management and Data Processing and Data Protection Policy prepared in advance by the ISD.

LEGAL COMPLIANCE

In developing the provisions of this informative, the ISD has taken particular account of the provisions of the 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) and the Hungarian Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereinafter: Information Act).

THE DATA OF THE CONTROLLER

- full name: **INTERNATIONAL SCHOOL OF DEBRECEN**
- short name: **ISD**
- registered seat: **4002 Debrecen Heltai Gáspár utca 1.**
- tax number: **26939944-2-09**
- registration number: **52484-2/2018/KÖZNEVIG**
- statistical identifier: **26939944-8510-931-09**
- language of the policy: **Hungarian – English in two-columns**
- electronic contact: e-mail: isd@isd.debrecen.hu <https://isd.debrecen.hu/>

- telephone number: +36 20 404 4822

(hereinafter: the ISD), as controller.

The ISD wishes to ensure, by way of the present Policy, data subjects' right to information pursuant to Articles 13 and 14 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, and repealing Directive 95/46/EC (General Data Protection Regulation, or GDPR).

The purpose of this Policy is to ensure that data subjects can receive suitable information on the personal data processed by the ISD, the source of such data, the purpose, the legal basis and the duration of the processing, the activities related to the processing, and – in case of the transmission of the data subject's personal data – the legal basis and the recipient of the transmission.

The ISD shall only process such personal data that is necessary for the given, specific purpose of processing.

The ISD shall provide information on the organizational and technical measures taken in the interest of the protection of personal data, as well as on the methods and options for exercising rights.

PROCESSING RELATED TO USERS OF THE WEBSITE

ISD currently operates the website <https://isd.debreceen.hu/> (hereinafter: Website). It is possible to use the Website also without providing data and also to request information by providing the name, e-mail and telephone number of the inquirer. The storage space for the ISD Website is provided by an external service provider (DiMa.hu Kft. 4032 Debrecen, Békéssy Béla u. 9/ C, 3/10).

Certain data of users of the Website, as well as certain data of the computers and other devices used, including IP addresses, shall be logged. These data are only used by the ISD for statistical purposes, for example, to determine how frequently visitors open the Website and how long time they spend there. The IP addresses are not linked by the ISD to any other data on the basis of which the visitors could be personally identified.

When accessing certain parts of the Website, "cookies", i.e., small-size data files, which may also contain personal data, are downloaded to the visitors' computer or other devices, in order to identify the visitor, to record data on their computer and to

facilitate their subsequent visits. Visitors may set up their browser software to notify them when the ISD wants to place a cookie on their computers or other devices, and may also block the receiving of cookies altogether. However, when cookies are blocked, certain pages may not work perfectly, and the visitor may not be authorised to access certain data.

When visiting the Website, the visitor and the ISD establish a connection through a telecommunications device, and the provision of information occurs via an open network (the Internet). This requires compliance with increased checking and security requirements on the part of the ISD. Accordingly, in accordance with its effective rules on data protection, the ISD strives to ensure that its services qualify as secure also on the basis of technical criteria. The same also applies to the service provider making the Website operated accessible, which is required to keep the personal data and other information coming into its possession as business secrets.

The ISD shall not be responsible for any information published by the visitor on the internet with the use of the Website.

With respect to content shared on links that may be available on the Website, the external operator of the services allowing the sharing of such content shall be considered the processor of personal data, and their activities shall be governed by their own terms of use and data protection policies, for which the ISD shall not be responsible.

The ISD uses external web analytics and ad-service companies for the operation of the Website, which carry out their activities independently of the ISD.

The ISD uses the Google Analytics Google AdWords service of Google Inc. Google Inc. uses cookies and web beacons for the purpose of collecting information, as well as to facilitate the analysis of the use of the Website. The information used by the cookies (including the IP address of the User) are stored on the servers of Google Inc. in the United States of America. Google Inc. may transmit the collected information to third parties, if required by law, or the given third parties may process the information for Google Inc. In the framework of Google AdWords remarketing, Google Inc. places cookies on the Users' devices tracking them and observing their online behaviours, on the basis of which Google Inc. makes available advertising on other websites, based on the user's behaviour and areas of interest. Such tracking cookies enable Google Inc. to identify the User on other websites as well. The "Privacy Policy" of Google Inc. is available on the website https://static.googleusercontent.com/media/www.google.com/en/intl/hu/policies/privacy/google_privacy_policy_hu.pdf. Further useful information on the activities of Google Inc. related to data, the blocking of cookies, and the personalization of advertisements is available on the following web page of Google Inc.: <http://www.google.com/intl/hu/policies/privacy/ads/>. It is not possible to block web beacons.

In case of persons using the Website only for the purpose of visiting, the processing of data is in their interest of getting information, in the course of which the starting and ending time of their visit, as well as the cookies are recorded by the ISD, which are retained electronically until the purpose of the processing is achieved or for a maximum of 2 years. In case of visitors to the Website, the legal basis for the processing of data is the consent of the data subject.

If it comes to the attention of the ISD that a visitor, by way of violating the rights of a third party or otherwise the laws, provides the personal data of another person, uses personal or other data publicly available on the Website or obtained unlawfully in a manner violating the rights of a third party or the laws (e.g. spam), or otherwise violated the rules of the present data protection policy or caused damage in the course of the use of the Website, the ISD shall take the necessary legal measures for obtaining compensation for the damage caused and/or calling the person engaging in the above acts to account for his or her acts before the law.

NEWSLETTER INFORMATION

The following provisions apply to the storage and processing of personal data related to the sending of newsletters based on the consent of the subscribers.

The Data Controller is not responsible for the truthfulness, accuracy and precision of the data provided by the data subject(s) during registration.

Our goal is to keep you informed about current information, news concerning us and to send you informative articles and materials.

We will send you newsletters only with your prior consent (newsletter registration). The legal basis for processing is therefore your consent, which you give by subscribing. [Article 6 (1) (a) GDPR]

When registering, you only need to provide your name and email address.

We will only send you our newsletters until you withdraw your consent by sending a declaration to the Data Controller. You can unsubscribe by clicking on the unsubscribe link in the Newsletter or by sending an unsubscribe e-mail to isd@isd.debreceen.hu or by post to the above address. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal. Of course, if you wish to change your mind, you can re-subscribe at any time.

Newsletters are sent by Mailchimp as the data processor (The Rocket Science Group, LLC; 675 Ponce de Leon Ave NESuite 5000, Atlanta, GA 30308 USA; Data transfer compliance is guaranteed by the application of the General Privacy Notice. <https://mailchimp.com/help/mailchimp-european-data-transfers/>)

The website is maintained by AD Design Ltd., 4025 Debrecen, Simonffy utca 4-6;

The hosting of the website is provided by DiMa.hu Kft. (headquarters: 4032, Debrecen, Békeyy Béla u. 9. building C. 3rd floor, door 10).

You may withdraw your consent at any time as indicated in this policy.

RULES OF PROCESSING

The ISD processes the data in its capacity as controller. The place of the processing shall be the registered seat of the ISD. The data are accessible by the director of the ISD, as well as by employees authorised by the director, in the interest of performing the service.

If any authority contacts the ISD requesting the provision of information, the disclosure or handing over of data or documents, the ISD shall make available to such authority the personal information indispensable for achieving the purpose of the request, provided that the authority identified the exact purpose and the scope of the data requested.

RIGHTS OF DATA SUBJECTS

1. RIGHT TO INFORMATION

The data subject may request the above information from the ISD by writing to the info@isd.debrecen.hu e-mail address. The ISD shall provide the requested information in an easily comprehensible form, in writing or in electronic form, as requested by the data subject, as soon as possible, but not later than one month after the submission of the request for information.

2. RIGHT TO ACCESS

Data subjects shall have the right to obtain from the ISD confirmation as to whether personal data concerning them are being processed, and, where that is the case, access to the personal data. The ISD shall make available to data subjects a copy of the personal data concerning them. For the additional copies requested by data subjects, the ISD may charge a reasonable amount based on administrative costs, which is a flat fee of HUF 15,000. Where data subjects submitted their request electronically, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to request a copy may not adversely affect the rights and freedoms of others.

RECTIFICATION AND ERASURE OF DATA

Upon the request of data subjects, the USD shall rectify personal data related to them without undue delay, and – also with a view to the purposes of the processing – the ISD shall ensure that any incomplete personal data are supplemented, including by way of the data subjects' supplementary statement.

The ISD shall erase the personal data related to a data subject, upon the request of the latter, without undue delay, if:

- the personal data are no longer required for the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- the data subject objects to the processing pursuant and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of his or her data for the purpose of direct marketing;
- the processing of the data subject's personal data is unlawful;
- the personal data must be erased to ensure compliance with a legal obligation under the laws of the EU or the Member State law to which the ISD is subject;
- the personal data have been collected in relation to the offer of information society services to children.

The rights set out in this section may be restricted only if the exceptions set out in the General Data Protection Regulation apply. The ISD shall inform all recipients to whom the personal data have been disclosed concerning any rectification or erasure, unless this proves impossible or involves disproportionate effort. At the request of the data subject, the ISD shall inform the data subject of these recipients.

3. RIGHT TO RESTRICTION OF PROCESSING

At the request of the data subject, the ISD shall restrict the processing of personal data where:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

- the data subject has objected to processing based on legitimate interests or for purposes of public interest; in this case, the restriction shall apply for a period pending the verification whether the legitimate grounds of the controller override those of the data subject.

The ISD shall inform all recipients to whom the personal data has been disclosed of the restriction of processing, unless this proves impossible or involves disproportionate effort. At the request of the data subject, the ISD shall inform the data subject of these recipients.

4. RIGHT TO DATA PORTABILITY

Each data subject shall have the right to receive the personal data related to him or her that was made available to the ISD, in a structured, commonly used and machine-readable format, and shall have the right to transmit those data to another controller, if:

- the processing is based on consent or contract as a legal basis in accordance with the General Data Protection Regulation, or

- the processing is carried out by automated means.

The provisions of the GDPR apply to the exclusion and limitation of the use of the right to data portability.

5. RIGHT TO OBJECTION

Each data subject shall have the right to object, on grounds relating to his or her particular situation, at any time, to processing of personal data related to him or her, including profiling. In such a case, the ISD may no longer process the personal data, unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or in case processing is for the establishment, exercise or defence of legal claims.

This right shall be explicitly brought to the attention of the data subject at the latest during the first contact with him or her, and the relevant information shall be presented clearly and separately from any other information.

6. AUTOMATED DECISION-MAKING, PROFILING

The ISD shall only apply a decision based on automated processing, including profiling, producing legal effects concerning the data subject or similarly affecting him or her to a significant degree where:

- it is necessary for the conclusion or performance of a contract between the ISD and the data subject;
- it is permitted by EU or national law applicable to the ISD which also lays down appropriate measures to safeguard the rights and freedoms and legitimate interests of the data subject;
- it is based on the explicit consent of the data subject.

For further requirements of automated decision-making and profiling, the provisions of the GDPR shall be applicable.

PROCEDURAL RULES

The controller shall provide information on action taken on a request under Articles 15-22 of the GDPR to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall also be provided by electronic means where possible, unless otherwise requested by the data subject.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay, and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The ISD shall provide the information requested free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or may refuse to act on the request.

LEGAL REMEDIES

Data subjects may initiate an investigation by the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa u. 9-11, postal address: 1363 Budapest, P.O. Box 9; email: ugyfelszolgalat@naih.hu; phone number +36-1-391-1400; web: www.naih.hu). The data subject shall have the right to initiate proceedings to be conducted by the competent Court of Law. The data subject may, at his/her choice, bring the action before the court competent for his or her address of permanent or temporary residence. The lawsuit filed in connection with the protection of personal data shall be exempt from court fees.