



MILESTONE
INSTITUTE

MILESTONE EDUCATION ASSOCIATION - PRIVACY POLICY FOR DONORS

Privacy Policy aimed at the donors of Milestone Education Association

Purpose of the Policy

In line with Regulation (EU) 2016/679 of the European Parliament and of the Council on the processing of personal data of natural persons (hereinafter referred to as "GDPR") and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information in Hungary (hereinafter referred to as "Infotv."), **the Milestone Education Association (hereinafter referred to as "the Institute") publishes the following information in relation to the handling and protection of the personal data of its donors (grant providers).**

1. About the data controller and its location

Data Controller:	Milestone Education Association / Milestone Oktatási Egyesület
Registered Address:	1077 Budapest, Wesselényi u 17.
Training Location:	1077 Budapest, Wesselényi u 17.
Tax Number:	19296425-1-42
Adult Education Registration Number:	B/2021/001083
Contact Information:	info@msinst.org , + 36 30 567 5499
Website:	www.milestone-institute.org

Representatives:	Andor Kelenhegyi (President) independently; Péter Palasics (Board Member) independently; György Greskovits (Board Member) independently
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2. Purpose, legal basis and duration of the personal data processing

The Institute is a legal entity engaged in adult education, education, training and talent management and development. It aims to operate and develop a high quality, progressive education centre that helps talented students to develop their talents and knowledge, achieve professional excellence, develop their interest in research and develop their leadership skills. In addition to its teaching activities, the Institute also works with companies and other organisations on a case-by-case basis, providing consultancy in talent research, management and development.

One of the Institute's key objectives is to promote equal opportunities for disadvantaged students and to support their education by creating and running various scholarship programmes.

Any natural person, legal entity or unincorporated organisation may make a grant to the Institute, which will be used to achieve the above tasks and objectives.

2.1 About data controlling in relation to making a donation

Scope of personal data being controlled	The name (first and last name), address, telephone number and e-mail address of the natural person providing the support as the data subject. If the donor is a legal entity, the name (first and last name), telephone number and e-mail address of the contact person of the legal entity will be processed, along with the company name, company tax number, address and company registration number.
Source of data	The data subject.

Purpose of data controlling	To take the necessary steps to establish a grant contract between the Institute and the data subject and to enforce the rights and obligations arising from the contract and to manage the relations with the contract.
Legal basis for data controlling	Pursuant to Article 6(1)(b) of the GDPR, the performance of a contract between the Institute and the data subject or the taking of steps at the request of the data subject prior to the conclusion of the contract. Where the donation is being provided by a legal entity, the processing of the data of the contact person of the legal entity is based on the legitimate interest of the Institute, pursuant to Article 6(1)(f) of the GDPR, in order to enable the Institute to contact the legal person on pre-contractual issues and to fulfil its contractual obligations and exercise its rights.
Data controlling period	5 years after the end date of the contractual relationship (general limitation period for enforcement), unless a longer retention period is required by law, in particular in the light of the retention obligations in accounting legislation.
Data processor(s)	—

2.2 About data being processed in relation to the payment of the donation

The donation (financial support) to the Institute may be paid by the donor by bank transfer to the Institute's bank account number 12011351-01760927-00100007 at Raiffeisen Bank Ltd.

The donor may also pay the amount of the grant via the PayPal payment system.

2.2.1 About data controlling in the event of donation payment by bank transfer

Scope of personal data being controlled	Name of the donor (surname and first name), bank account number, amount of the donation, date of transfer.
Source of data	The data subject.

Purpose of data controlling	To pay the donated amount.
Legal basis for data controlling	Performance of a contract concluded between the Institute and the data subject pursuant to Article 6(1)(b) of the GDPR.
Data controlling period	Pursuant to Article 169 (2) of Act C of 2000 on Accounting, the obligation to keep accounting records in order to comply with relevant legislation is for 8 years.
Data processor(s)	Milestone Consulting Kft. (Ltd.) for the provision of financial and accounting services.

2.2.2 About data controlling in the event of donation payment through the PayPal payment system

PayPal is an online payment service, processing payments through so-called PayPal accounts, which are virtual private or business accounts. PayPal can process payments without a PayPal account, using a credit card. A PayPal account works using an email address, so there is no classic account number for PayPal accounts.

A PayPal fizetési rendszer használata során az érintett adatai automatikusan továbbítódnak a PayPal felé, így az Intézet az érintett bankkártya adatait nem kezeli. A PayPal európai működtetője: PayPal (Europe) S.à.r.l. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxemburg, az általa ellátott adatkezelési tevékenység részletes leírását az alábbi linkeken tekintheti meg: <https://www.paypal.com/myaccount/privacy/privacyhub>.

In relation to the payment of the donation amount, the Institute will process the personal data of the data subject exclusively in connection with the use of PayPal and the crediting of the bank account of the Institute 12011351-01760927-00100007 with Raiffeisen Bank Zrt (Ltd.).

Scope of personal data being controlled	Name (first and last name), e-mail address, IP address, transaction ID, amount of the donation, time of the transfer.
Source of data	The data subject.
Purpose of data controlling	To pay the donated amount.

Legal basis for data controlling	Performance of a contract concluded between the Institute and the data subject pursuant to Article 6(1)(b) of the GDPR.
Data controlling period	Pursuant to Article 169 (2) of Act C of 2000 on Accounting, the obligation to keep accounting records in order to comply with relevant legislation is for 8 years.
Data processor(s)	In order to process the payment transaction, the name (first and last name), e-mail address, IP address of the data subject and the amount of the donation will be transmitted to PayPal. A detailed description of PayPal's data processing activities is available at: https://www.paypal.com/myaccount/privacy/privacyhub
Scope of personal data being controlled	PayPal (Europe) S.à.r.l. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg, which operates the PayPal payment system. Milestone Consulting Kft. (Ltd.) for the provision of financial and accounting services.

2.2.3 About data controlling in the event of donation payment in cash

Scope of personal data being controlled	Name of the donor (surname and first name), amount of the donation, date of transfer.
Source of data	The data subject.
Purpose of data controlling	To pay the donated amount.
Legal basis for data controlling	Performance of a contract concluded between the Institute and the data subject pursuant to Article 6(1)(b) of the GDPR.
Data controlling period	Pursuant to Article 169 (2) of Act C of 2000 on Accounting, the obligation to keep accounting records in order to comply with relevant legislation is for 8 years.
Data processor(s)	Milestone Consulting Kft. (Ltd.) for the provision of financial and accounting services.

3. Key rights of the data subject in relation to data processing

The data subject may, in connection with the processing of their personal data, at any time:

- request information on the processing,
- request access to the data processed concerning them,
- request access to data concerning them, the rectification of inaccurate data or the completion of incomplete data,
- request the erasure of data processed on the basis of their consent,
- object to the processing of their data,
- request the restriction of processing.

On the basis of a request for information, the data subject may, unless it is restricted by a legitimate interest, find out whether their personal data are being processed by the Institute and has the right to obtain information about the processing of their data with regards to:

- the purposes for which the Institute processes it,
- what gives the Institute the right to process the data (legal basis),
- from when and for how long the Institute processes their data (duration),
- what data is processed by the Institute (a copy of which is made available to the data subject upon request),
- the recipients of the personal data and the categories of recipients,
- transfers to third countries or international organisations,
- if not collected from the data subject, the source of the data,
- the characteristics of automated decision-making, if used by the controller,
- the data subject's rights in relation to the data processing,
- the legal remedies available to them.

The Institute shall reply to requests for information and access within one month at the latest. The Institute may charge a reasonable fee, based on administrative costs, for any additional copies of personal data relating to the data subject which it requests to be made of personal data relating to them.

In the event of a request for rectification (amendment) of data, the data subject shall substantiate the accuracy of the data requested to be amended and shall also certify that the person entitled to the amendment is the person who requests the amendment. Only in this way can the Institute assess whether the new data is accurate and, if so, whether it can amend the old data.

If it is not clear whether the data processed is correct or accurate, the Institute will not correct the data, but only flag it, i.e. indicate that it has been objected to by the data subject,

but not necessarily incorrect. The controller shall, without undue delay, correct the inaccurate personal data or complete the data covered by the request, after confirming the authenticity of the request. The Institute shall notify the data subject of the correction or marking.

When requesting the erasure or blocking of data, the data subject may request the erasure of their data, which means that the Institute is obliged to erase data relating to the data subject without undue delay if:

- the personal data have been unlawfully processed,
- the personal data are no longer necessary for the purposes for which they were processed,
- if the processing was based on the data subject's consent and they have withdrawn it and no other legal basis justifies the continued processing of the data,
- the Institute is under a legal obligation to erase the data and has not yet complied with such an obligation.

The data subject may request restriction of processing, which the controller will comply with if one of the following conditions is met:

- the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the controller to verify the accuracy of the personal data,
- the processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use,
- the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; that is, to oppose the processing concerning them;
- the data subject has objected to the processing; in this case, the restriction shall apply for a period of time until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject.

Where the data are subject to restriction, such personal data may be processed, except for storage, only with the consent of the data subject or for the establishment, exercise or defence of legal claims or the protection of the rights of another natural or legal entity or of an important public interest of the European Union or of a Member State. The Institute shall inform the data subject in advance of the lifting of any restriction on processing.

The data subject shall have the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data on the basis of Article 6(1)(f). In such a case, the Institute 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 for the establishment, exercise or defence of legal claims.

If the data subject considers that the processing of their personal data infringes the provisions of the GDPR or the Infotv., or if they consider that the way in which the Institute processes their personal data is prejudicial, we recommend that they first contact the Institute with a complaint. Your complaint will always be investigated.

If, despite your complaint, you still have a grievance about the way the Institute handles your data or you wish to contact an authority directly, you can file a complaint with the National Authority for Data Protection and Freedom of Information ('Nemzeti Adatvédelmi és Információszabadság Hatóság', address: 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, PO Box 9.; e-mail: ugyfelszolgalat@naih.hu, website: www.naih.hu).

You have the right to take your data to a court, which will rule on the matter out of turn. In this case, you are free to choose whether to bring your action before the court of your domicile (permanent address) or residence (temporary address) (<http://birosag.hu/torvenyszekek>).

You can find the court in your place of residence or domicile at <http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso>.

Final provisions

This information notice enters into force upon signature and remains in force until revoked.

Budapest, 10 April 2025

Andor Kelenhegyi

President

Milestone Education Association