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MILESTONE EDUCATION ASSOCIATION – DATA PROCESSING POLICY FOR SCHOLARSHIP APPLICANTS

Data Processing Policy in Connection with the Scholarship Application announced by Milestone Educational 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 regarding the processing and protection of personal data related to the scholarship applications of students applying for extracurricular training programs announced by the Institution.**

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



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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

As an adult education provider operating under notification, in accordance with Act LXXVII of 2013 on Adult Education (hereinafter: Fktv.), the Institute's staff, in the course of performing their job duties or contractual assignments, may access and process the personal data of the students only to the extent necessary for the administration of the educational activities.

2. Purpose, legal basis and duration of the personal data processing

2.1 Data processing related to application for the social scholarship announced by the Institute. This includes data processing during application for the Bridge Scholarship, which combines admission and scholarship applications.

In the case of applying for the Bridge Scholarship, a combined admission and scholarship application is submitted. The content of the data for the scholarship application is identical to that of the social scholarship application, and therefore the provisions of this section apply to such data processing.

Scope of Processed Data	<p>Applicant's name (surname and first name) address, email address, in certain cases, the fact of the applicant being half-orphaned, orphaned, or pregnant.</p> <p>Information voluntarily provided by the applicant on the application form regarding other reasonable social circumstances.</p> <p>Names, occupations, incomes of those living in the same household as the applicant, and other personal data included in documents supporting recognized expenses (e.g., medication costs, care expenses), such as bank account number, information on the source and amount of income, type and amount of expenses.</p>
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Source of Data	The student applying for the scholarship.
Purpose of Data Processing	Evaluation of the scholarship application.
Legal Basis of Processing	<p>Article 6(1)(b) of the GDPR – processing is necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract.</p> <p>Regarding data on pregnancy or voluntarily provided social circumstances, the legal basis is Article 6(1)(a) and Article 9(2)(a) of the GDPR – explicit consent, given voluntarily and expressly through submission of the scholarship application.</p>
Duration of Data Processing	<p>Until the conclusion of the scholarship evaluation process, i.e., when the Institute notifies all applicants of the result and, if requested, informs rejected applicants of the reason for rejection. This occurs within 60 days after the latest scholarship application deadline.</p> <p>In the case of successful applications, personal data (e.g., student's name, scholarship amount) as stated in the resolution of the Scholarship Committee will be processed by the Institute until the last day of the eighth year following the conclusion of the adult education contract, under Section 21(5) of the Fktv., as the resolution is an annex to the training contract. Other data are processed by the Institute until the training relationship exists.</p>
Data Processor	<p>Hosting provider</p> <p>Developers and operators of online systems used in the application process (Google, Salesforce, Canvas)</p> <p>Instructor employed by the Institute who participates as a member of the Scholarship Committee in evaluating the scholarship applications</p>



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If the Institute requests the applicant to present an address card either in person during the registration prior to the written admission exam, or during a later online call, in order to verify the number of people living in the same household, i.e. the address data of the household members, the data processing shall be carried out as follows.

Scope of Processed Data	<p>In the case of personal verification of address cards: Image of the address cards of the applicant and those living in the same household.</p> <p>In the case of an online call: Image, voice, and other personal data of the applicant student perceivable through the online connection, environment, image of the address cards of the applicant and those living in the same household (for presentation only).</p> <p>If the applicant student uses an assistant during the online call, then the assistant's personal data (image, voice, other personal data perceivable through the online environment).</p>
Source of Data	The student applying for the scholarship.
Purpose of Data Processing	Verification of the number of people living in the affected household, i.e. the address data of household members.
Legal Basis of Processing	According to Article 6(1)(b) of the GDPR, the processing is necessary for steps taken at the request of the data subject.
Duration of Data Processing	<p>In person, only during the time of address verification.</p> <p>Online, only during the call, with the condition that the call may not be recorded.</p>
Data Processor	<p>The colleague employed by the Institute who is present on the day of the written admission exam.</p> <p>Online, the provider of the remote connection service.</p>



2.2 Data processing related to the application for the academic scholarship announced by the Institute

Scope of Processed Data	The applicant student's name (surname and first name), email address, competition results, if applicable, information regarding their role as a student leader (its fact, date, name of the institution concerned), as well as other information provided by the applicant regarding participation in possible research or projects.
Source of Data	The student applying for the scholarship.
Purpose of Data Processing	Evaluation of the scholarship application.
Legal Basis of Processing	According to Article 6(1)(b) of the GDPR, the processing is necessary for steps taken at the request of the data subject.
Duration of Data Processing	<p>Until the evaluation of the scholarship applications is completed, which is considered complete when the Institute has notified all applicants of the outcome, and has informed rejected applicants of the reason for rejection upon request. This takes place within 60 days following the latest scholarship application deadline.</p> <p>In case of a successful application, the personal data included in the decision of the Scholarship Committee (such as the student's name, the amount of the scholarship) will be processed by the Institute until the last day of the eighth year following the conclusion of the adult education contract pursuant to Section 21(5) of the Fktv., as the decision forms an annex to the training contract. Other data are processed by the Institute until the training relationship exists.</p>
Data Processor	<p>Hosting provider.</p> <p>Developers and operators of the online systems participating in the application process (Google, Salesforce, Canvas).</p> <p>Instructor employed by the Institute, who participates in the evaluation of the scholarship applications as a member of the Scholarship Committee.</p>



2.3 Data processing related to the application for the Lyons Scholarship

Students in need (lower income) with Jewish ancestry and identity can apply for the scholarship offered by the West London Synagogue. In relation to this scholarship application, the West London Synagogue and the Institute act as joint data controllers.

The evaluation of the scholarship consists of two parts: the applicant must answer questions related to their Jewish identity and heritage connected to the scholarship, which are evaluated by the West London Synagogue. Its data processing notice is available at the following link: <https://www.wls.org.uk/privacy-policy>.

In addition, the applicant student must also fill out a social scholarship application, which is evaluated by the Institute, so for this data processing, the provisions in point 2.1 of this notice apply, with the addition that the scope of the processed data is supplemented with the applicant's Jewish origin, which is processed based on Article 6(1)(a) and Article 9(2)(a) of the GDPR, and such consent is given in an explicit form, voluntarily, by submitting the scholarship application. The recipient of this data processing is the West London Synagogue acting in the joint data controlling arrangement.

2.4 Bulgarian Nationality Scholarship

This scholarship is awarded by the Milestone Institute with co-financing from the Self Government of Bulgarians in Hungary. The scholarship application is announced and evaluated by the Milestone Institute. The amount of the tuition discount is determined by the institute taking into account the reasonable socio-economic circumstances of the applicants. Submitting the application requires a letter of recommendation that can be requested from and completed by the Self Government of Bulgarians in Hungary.

Scope of Processed Data	The applicant student's name (surname and first name), email address, the fact of their Bulgarian nationality.
Source of Data	The student applying for the scholarship.
Purpose of Data Processing	The data is processed for administrative and allocation purposes, that is, to ensure that the Institute has an accurate picture of which students in a legal relationship with the Institute or applying for admission are applying for this type of scholarship also financed by the Institute.



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Legal Basis of Processing	<p>According to Article 6(1)(a) of the GDPR, the data subject's consent.</p> <p>Regarding the data on the applicant student's Bulgarian nationality, the legal basis for data processing is Article 6(1)(a) of the GDPR, in conjunction with the condition set out in Article 9(2)(a), with consent given explicitly and voluntarily through submission of the scholarship application.</p>
Duration of Data Processing	<p>Until the scholarship applications are evaluated by the Milestone Institute.</p> <p>In the case of a successful application, the student's name and the amount of the scholarship will be processed by the Institute until the last day of the eighth year following the conclusion of the adult education contract, pursuant to Section 21(5) of the Fktv., considering that the scholarship is provided as a tuition discount, and this data forms part of the training contract.</p>
Data Processor	<p>Hosting provider.</p> <p>Developers and operators of the online systems participating in the application process (Google, Salesforce, Canvas).</p>

2.5 District VII Scholarship

Considering that this scholarship is provided to students whose place of residence or high school is located in Budapest's District VII and who have successfully applied for a social and/or academic scholarship, the data processing related to the scholarship application is governed by points 2.1 and 2.2 of this notice, with the addition that the scope of the processed data is supplemented with the address of the applicant student or the name and address of their high school.

Data processing for informing the student's legal representative

The Institute provides information to the legal representative of the student who submitted the scholarship application upon request regarding the types of scholarships, the conditions of application, the scope of documents and information to be submitted, and any questions related to the completion of missing documents.



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Scope of Processed Data	The legal representative's name (surname and first name), email address, phone number.
Source of Data	The data subject.
Purpose of Data Processing	Providing information regarding questions related to the scholarship application.
Legal Basis of Processing	<p>According to Article 6(1)(f) of the GDPR, the Institute's legitimate interest in informing the legal representative of an incapacitated or partially incapacitated minor about all questions related to the scholarship application.</p> <p>The legal representative, as the data subject, has the right to object at any time, for reasons related to their particular situation, to the processing of their personal data as described above. In case of objection, the Institute may not continue processing the personal data unless it proves that the processing is justified by compelling legitimate grounds which override the interests, rights, and freedoms of the legal representative, or which relate to the establishment, exercise, or defense of legal claims.</p>
Duration of Data Processing	Until the scholarship applications are evaluated, which is considered completed when the Institute has notified all applicants of the outcome and has informed rejected applicants of the reason for rejection upon request. This occurs within 60 days after the latest scholarship application deadline.
Data Processor	–

Positive evaluation of the scholarship application

In the case of a positive evaluation of the scholarship application, the scholarship is provided in the form of a tuition discount, which is included in the training contract, and the decision of the Institute's Scholarship Committee forms an annex to the adult education contract. Accordingly, regarding data processing related to the adult education relationship, the provisions set out in the data processing notice prepared by the Institute for applicants



and admitted students to the training organized by the Milestone Educational Association shall apply, which is available at:

<https://milestone-institute.org/hu/milestone-intezet-adatkezeles/>

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



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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



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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



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Andor Kelenhegyi

President

Milestone Education Association