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MILESTONE EDUCATION ASSOCIATION – DATA PROCESSING POLICY FOR OPEN-DAY APPLICANTS

Data Processing Policy in Connection with the Open-day registrations organized 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 in connection with data processing carried out during registration for and participation in the Open Days announced by the Institute.**

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



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Website:	www.milestone-institute.org
Representatives:	Andor Kelenhegyi (President) independently; Péter Palasics (Board Member) independently; György Greskovits (Board Member) independently

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

The staff of the Institute, as an adult education provider operating based on notification under Act LXXVII of 2013 on Adult Education (hereinafter: Fktv.), access and process the personal data of those registering for and participating in the Open Day to the extent necessary in connection with the performance of their job duties or assignments.

2.1 Data processing related to registration for the Open Days announced by the Institute

The Institute announces Open Days, among other purposes, to present its educational programs, the admission process, and the Milestone community, where participation is subject to registration.

Scope of Processed Data	<p>The data required for registration, without which registration is unsuccessful:</p> <ul style="list-style-type: none">– student's name (surname and first name), email address, name of their high school, and– name (surname and first name), email address, and phone number of the student's legal representative interested in the Institute, and– other information necessary for organizing the Open Day (indication of the type of program the student is interested in, selected Open Day date, number of participants, expected year of the student's graduation). <p>Optional data that may be provided on the registration interface:</p> <ul style="list-style-type: none">– name of the student's high school,– other personal data possibly provided in the section designated for questions related to the Institute's educational activities and admission procedure, and– other information (how they heard about the Institute, whether it is the student's first visit to the Institute, whether a relative of the student has studied at the Institute).
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Source of Data	The data subject.
Purpose of Data Processing	Registration for the Open Day, confirmation of the registration, sending a reminder about the selected Open Day date and its format (in-person or online), and organizing the event.
Legal Basis of Processing	<p>Article 6(1)(a) of the GDPR, i.e. the data subject's consent, which is given by completing the registration form.</p> <p>You may withdraw your consent at any time by submitting a request to any of the contact addresses listed in this notice or published on the Institute's website. In such case, your personal data processed based on consent will be deleted without delay. Please note that withdrawal of consent means cancellation of the registration, which prevents participation in the Open Day.</p>
Duration of Data Processing	Until the conclusion of the Open Days.
Data Processor	<p>Hosting provider.</p> <p>Developers and operators of the online systems related to registration: Salesforce, Salesforce.com Inc., San Francisco, California, USA. Google (Apps, Mailing, etc.), Google LLC, Mountain View, California, USA.</p> <p>The data processing of the systems listed above is carried out according to their own privacy policies. In this regard, please refer directly to the privacy policies available on the websites of the third parties and read further information about their data processing practices.</p>

2.2 Data processing related to Open Days held in online format

The Institute is entitled, at its own discretion, to decide whether to hold the Open Days in an online format instead of in-person attendance.



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The online Open Day can be accessed via a subpage of the Institute's website – <https://milestone-institute.org/hu/nyilt-nap/> – by entering the name and email address of the registrant for the Open Day and the access code previously sent by the Institute via email, using the Zoom system. The use of the Zoom system does not require separate registration; the login data (email address) is recorded by the Zoom system independently of the Institute.

Participation in the online Open Day is voluntary; participants are not required to turn on their microphone or webcam, including in cases when they wish to speak or ask questions.

Participants also have the option to ask questions and make comments without speaking, using the designated chat window, which likewise does not require them to turn on their microphone or webcam.

Scope of Processed Data	<ul style="list-style-type: none">– Name and email address of the legal representative of the student interested in the Institute– If applicable (speaking, asking questions), the voice of the participant in the Open Day held online (legal representative, student), image if webcam is used, as well as other personal data perceivable through the online connection, and their environment
Source of Data	The data subject
Purpose of Data Processing	Holding the Open Day in online format organized by the Institute to present its educational program, admission process, and the Milestone community



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Legal Basis of Processing	<p>According to Article 6(1)(a) of the GDPR, the data subject's consent, which is given explicitly by joining the online Open Day and, if applicable, by turning on the microphone and/or webcam Consent is voluntary, as the Institute provides the option for the data subject to speak without using a webcam, and the data subject also has the opportunity to ask questions and make comments without speaking, through the designated chat window</p> <p>Consent is also voluntary because, regardless of participation in the online Open Day, the Institute provides an opportunity for data subjects to ask questions by sending a message to the email address available on its website (https://milestone-institute.org/hu/nyilt-napok/) or via its phone contacts, and such questions are always answered</p>
Duration of Data Processing	During the Open Day, with the understanding that the content of the Open Day is not recorded
Data Processor	Hosting provider The service provider ensuring the remote connection

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),



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- 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.



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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).



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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