

## PRIVACY POLICY

This Privacy Policy provides information regarding the processing of personal data for visitors and users registering on the website of the **Biatorbágy Innovative Technical School and Gymnasium** (address: 2051 Biatorbágy, Antall József u. 1., Hungary; OM identification number: 910018) operated by the **Hungarian Interchurch Aid** (tax number: 19662927-1-43; registered seat: 1221 Budapest, Kossuth Lajos u. 64.; represented by: László Lehel, President–Director), which is the maintainer of the Biatorbágy Innovative Technical School and Gymnasium (hereinafter: **BIT**). The notice applies to visitors and registrants of the website **bit-edu.hu** (hereinafter: “Data Subject”).

### 1. Principles and Purposes of Data Processing

BIT protects personal data provided and authorized by the Data Subject and processes only such data that are essential and appropriate for achieving the purpose of data processing. During the processing of personal data, BIT respects the rights, fundamental freedoms, and the right to privacy of the Data Subject.

The provisions of this notice apply whenever BIT processes personal data of natural persons wholly or partly by automated means, as well as when non-automated processing of personal data forms part of a filing system or is intended to form part of such a system.

BIT processes and uses the data exclusively in connection with its **educational, training, and related marketing activities** (hereinafter: “purpose of data processing”). During meetings organized by BIT, photographs and video recordings may be taken. These may be used on the website, Facebook page, Facebook groups, at BIT events and training sessions for the purposes of presenting and promoting BIT’s activities, as well as for preparing summaries of events.

### 2. Processed Data

The categories of data processed by BIT outside contractual or student legal relationships, as well as the purposes of processing, are listed in the annex at the end of this notice.

**Legal basis for data processing:** voluntary consent of the Data Subject.

**Duration of data processing:** until the withdrawal of consent.

**Control over personal data:**

The Data Subject may request the deletion or modification of their data at any time by sending an email to: **kapcsolat@bit-edu.hu**.

BIT will comply with such a request without undue delay, but no later than **10 days** after receiving the request.

### 3. Rights of Data Subjects and Legal Remedies

The Data Subject may request written information about their personal data processed by BIT. Within **25 days** of receiving the request, BIT will provide information about the data processed and the provisions of this Privacy Policy, as well as—if data transfer has taken place—the legal basis and recipient of such transfer.

The Data Subject may object in writing to the processing of their personal data (except where processing is mandatory by law) and may request the correction, deletion, or restriction of their personal data. BIT will respond to the request within **15 days** of receipt.

If the Data Subject is not satisfied with the response of the Data Controller, they may enforce their right to the protection of personal data before a court and may also contact the **National Authority for Data Protection and Freedom of Information** ([www.naih.hu](http://www.naih.hu)).

BIT keeps records of data protection incidents for the purpose of monitoring related measures and informing the Data Subject. These records include the personal data of the Data Subject, the scope and number of persons affected by the incident, the date and circumstances of the incident, its effects, and the measures taken to remedy it, as well as other data specified by the **GDPR** and the Hungarian **Information Act**.

The Data Subject may request the correction or deletion of incorrectly recorded data at any time. BIT will delete the data within **5 working days** of receiving the request; in such cases the data cannot be restored. This deletion does not apply to data processing required by law (e.g., accounting regulations); such data will be retained for the legally required period.

The Data Subject may request the restriction (blocking) of their data. BIT will restrict the processing of personal data if requested by the Data Subject or if, based on the available information, it can be assumed that deletion would harm the legitimate interests of the Data Subject. Restricted personal data may only be processed for as long as the purpose of data processing that excluded deletion continues to exist.

The Data Subject will be informed about the correction, restriction, or deletion of their data. If BIT does not comply with the request for correction, restriction, or deletion, it will provide written justification for the refusal within **30 days** of receiving the request.

#### **4. Storage and Access to Data**

Access to the processed data is granted only to authorized employees of BIT who participate in the provision of services related to the data processing.

To ensure the security of the data, BIT applies at least the protection systems generally used in the field of education and ensures their regular updating and expansion. In addition, BIT takes all reasonable measures to prevent unauthorized access to the processed data.

#### **5. Data Processing and Data Transfer**

BIT does not transfer the Data Subject's data to third parties without the explicit approval of the Data Subject. Data may only be transferred based on the Data Subject's prior, detailed, voluntary, and informed consent.

For the purposes specified in this Privacy Policy, third parties may also access the data. In such cases, the Data Controller is subject to the obligations set out in Section 9 (1)–(5) of the Hungarian Information Act.

## 6. Data Protection Incident

A data protection incident means the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data transmitted, stored, or otherwise processed by BIT.

In the event of a data protection incident, BIT will notify the **National Authority for Data Protection and Freedom of Information** within **72 hours** of becoming aware of the incident, unless the incident is unlikely to result in a risk to the rights and freedoms of the Data Subject.

If the data protection incident is likely to result in a **high risk** to the rights and freedoms of the Data Subject, BIT will inform the Data Subject of the incident **without undue delay**.

## 7. Scope and Modification of the Privacy Policy

This Privacy Policy has been prepared in accordance with **Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)** and **Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Information Act)**.

BIT reserves the right to **unilaterally modify this Privacy Policy with effect for the future**.

**Effective date:** September 1, 2023.

## Annex 1

### Categories of Personal Data Processed

<b>Data Subject Category</b>	<b>Description</b>	<b>Personal Data Processed</b>	<b>Purpose of Processing</b>
Website Visitor	Visitors to the BIT website may contact BIT via email.	Email address	Responding to visitor inquiries; Providing insight into the life and activities of BIT; Maintaining communication
Newsletter Subscriber	Visitors may subscribe to the BIT newsletter through the website. The newsletter provides news, updates, information about events, and media appearances related to BIT's activities.	First name; Last name; Email address	Promotion of BIT's activities; Sending newsletters and informational updates
Applicant for a Teaching Position	Applications for teaching positions advertised on the BIT website or elsewhere may be submitted through the website.	First name; Last name; Email address; Phone number; LinkedIn profile	Recruitment and selection of future teachers; Communication with applicants
Photo and Video Recording at Events	Photos and videos may be taken during events organized by BIT.	Image of the data subject; Video recordings; Audio recordings	Preparing and publishing event reports and promotional content on BIT's online platforms
Participants of BIT Introduction Events (e.g. Open Day, Preparatory Courses, School Tours, Festivals, etc.)	By completing the registration form available through BIT's online platforms, interested individuals may participate in events introducing BIT or other events organized by the institution.	First name; Last name; Email address; Phone number; Address; OM identification number (for students); Billing details	Communication with participants; Administrative purposes