## 1. Introduction

Our privacy policy provides a summary concerning the use of personal information you provide to the Preparatory Institution for International Students (hereafter: PIFIS) while you are in the European Union (EU) in connection with your application for enrollment at the Corvinus University or Budapest Business School – University of Applied Sciences.

The General Data Protection Regulation (hereafter: GDPR) is a European Union Regulation that has been designed to strengthen and unify Data Protection within the EU. The GDPR came into effect on 25 May 2018. The new regulation introduced more stringent requirements for protection and accountability, and gave individuals more control over their personal data. The GDPR harmonises Data Protection practices across the EU and emphasises transparency, security and accountability by data controllers and processors, while at the same time standardising and strengthening the right of users to privacy of their personal data.

By providing the requested information you declare that you acknowledge and accept the version of this informative which is operative at the time the information was provided, and deliberately give permission to the use of your personal information.

#### Main normative laws

Regulation 2016/679 of the European Parliament and of the Council (EU) on the management of personal data for natural persons (GDPR); Act LXXVII of 2013 on Adult Education; Act CXII of 2011 on the right to information self-determination and freedom of information; Act V of 2013 on Civil Code; Act CVIII of 2001 on e-commerce services and information society services; Act C of 2003 on Electronic Communications; Act CLV of 1997 on Consumer Protection; Act CLXV of 2013 on Complaints and Announcements of Public Interest; Act C of 2000 on Accounting.

2. Data controller

Name

Preparatory Institution for International Students (PIFIS) Nemzetközi Diákok Előkészítő Intézete Kft. Company registration number: 1309169968 VAT number: 11873776213

Contact

Address: 47 Váci utca, Budapest, Hungary, H-1056 E-mail: info@pifis.hu Phone: +36 30 448-4093

Who we are?

PIFIS (Preparatory Institution for International Students) was established in 1991 and organise the official one year preparatory program of Corvinus University and Budapest Business School – University of Applied Sciences. The courses are taught by experienced Mathematics and English

teachers, some of them have been teaching here since the program started. Our goal is to help foreigner students to gain the English and mathematic skills that are needed in order to get into Hungarian universities. In order to carry out and advance our activity, PIFIS maintains and processes personal data collected during the course of our relationship with students.

3. Data protection for website visitors

3.1 Our web server processes a wide range of data for each request, which your browser automatically transmits. These data include the IP address allocated to your device, the date and time of your request along with the time zone, the browser used, the specific page or file you accessed, the HTTP status code as well as the data quantities transmitted; the website from which your request originated (HTTP referer), and the operating system of your device and the language used. Our web server is using these data automatically in order to make the contents of our website available for you in the best possible way on your device.

3.2 We use a tool called 'Google Analytics' to measure traffic to our site and how users interact with our site – we use this information only to improve this site. Google Analytics collects information such as how often users visit this site, which pages they visit, when they do so, and what other sites they used prior to coming to this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other personally identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. We have turned on IP anonymization in Google Analytics: this feature anonymizes the address as soon as technically feasible at the earliest possible stage of the collection network. The IP anonymization feature in Analytics sets the last octet of IPv4 user IP addresses and the last 80 bits of IPv6 addresses to zeros in memory shortly after being sent to the Analytics Collection Network. The full IP address is never written to disk in this case. Although Google Analytics plants a cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to our site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: http://www.google.com/intl/en/policies/privacy/

You can opt-out of having your activity on the website made available to Google Analytics by installing an opt-out browser add-on (https://tools.google.com/dlpage/gaoptout). The Google Analytics opt-out browser add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

3.3 We use cookies (a small text file sent by your computer each time you visit our site) or similar technologies to record data or to collect and store information when you visit this site. Many browsers default to accepting cookies. You may be able to change this setting in your browser, and you can also clear your cookies. Check your browser's help section to learn more about your cookie setting options.

We may use the following types of cookies: Analytics cookies Essential cookies Functionality cookies General information about cookies can be found at https://en.wikipedia.org/wiki/HTTP\_cookie 3.4 Log and communications data are not passed on to third parties except under special circumstances. In case of suspicion of a crime or in investigative proceedings, data may be transmitted to the police and the public prosecutor's office.

3.5 IP addresses are anonymized at the latest after 24 hours. Pseudonymous usage data will be deleted in each case after 6 months. Communication content will be deleted after 5 calendar years.

3.6 Use of our website without disclosure of personal data such as the IP address is not possible. Communication via the website without providing data is not possible.

#### 4. Purpose for data processing

Your data is used by PIFIS for a number of administrative (review of your application as preliminary review for the admission to our preparatory program) and academic purposes (carrying out Math and English courses) in connection with your application for enrollment at the Corvinus University or Budapest Business School – University of Applied Sciences.

#### 5. Legal basis for data processing

We store and process personal data according to the regulations of the current Adult Education Legalislation. As part of our work at PIFIS, we process and store personal information relating to applicants and students and we therefore adhere to the applicable data protection rules. We take our responsibilities under these rules seriously and ensure the personal information given by our users is held, used, transferred and processed in accordance with the applicable data privacy regulation. PIFIS processes the information it obtains in pursuit of our legitimate interests in communicating with applicants and students; providing benefits and services to applicants and students. We may pursue these legitimate interests by contacting you by telephone, email or post. PIFIS will sometimes process your data on an alternative legal basis – for example, based on a legal obligation (when reporting may be required to the Hungarian tax or other authorities, for instance) or when you give your explicit consent to us to do so.

## 6. Personal data collected

PIFIS maintains records of all former students and, as such, we hold education records in perpetuity.

## 7. Who may receive your personal information?

Partner universities, public authorities and offices may receive data within the scope of their duties, insofar as we are obligated or entitled to transmit data to them. We also use processors by means of service agreements to perform services, in particular to provide, maintain and support IT systems. Recipients of your data may include banks and financial institutions for the processing of payments in each application process.

PIFIS works closely together with Corvinus University and Budapest Business School – University of Applied Sciences. Any transmission of data between PIFIS and these universities is managed through agreed processes which comply with relevant data protection legislation. These universities elaborate their own data protection procedures in their privacy policies similar to this one, which may be found on the respective university's web page.

Corvinus University of Budapest 8 Fővám tér, Budapest, Hungary, H-1093 http://www.uni-corvinus.hu/index.php?id=eng Budapest Business School – University of Applied Sciences 29-31. Markó utca, Budapest, Hungary, H-1055 https://en.uni-bge.hu/

Unless we have a legal obligation to do so, we will never disclose your data to individuals, organizations, or other entities outside PIFIS other than those who are acting as agents and data processors working on our behalf.

Certain data may be transmitted to the applicants' country of origin or to a country in which the applicant obtained certificates or in which the applicant resides, for example embassies, Hungarian institutions, universities or other educational institutions. Therefore your data can be transmitted to so called 'third countries', which means countries outside the European Union and the European Economic Area (EEA). It is therefore possible, that your rights under the GDPR are not fully safeguarded. For example it is possible that access to personal data thought public authorities in third countries is not restricted in the same secure way as such restrictions apply in Hungary. It is also possible that public authorities in third countries will not fully comply with the obligations to provide information.

We may need to pass your information to our third party service providers, agents, subcontractors for the purposes of providing services to you on our behalf. However, with all external entities with whom data is shared, we share only those data needed to perform the specific service and require a contract and/or confidentiality and non-disclosure agreement to be signed before any data transfer.

Specific third parties/data processors we work with include:

Google LLC – Service name: GSuite, as e-mail hosting provider Seat: 1600 Amphitheatre Parkway, Mountain View, USA, CA 94043 Web: https://gsuite.google.com/intl/hu/features/ Privacy: https://policies.google.com/privacy?hl=en

Amazon EU S.a.r.L. (AWS Europe) – Service name: Amazon SES, as transactional e-mail provider Seat: 23 r. du Puits Romain, Luxembourg, 8070 Bertrange Web: https://aws.amazon.com/ Privacy: https://aws.amazon.com/privacy/

Wix.com Ltd. – Service name: website builder framework Seat: 40 Namal Tel Aviv St., Tel Aviv, Israel Web: https://www.wix.com/ Privacy: https://www.wix.com/about/privacy

Wix.com Ltd. is based in Israel, which is considered by the European Commission to be offering an adequate level of protection for the Personal Information of EU Member State residents.

8. Your rights

You have a right to access your personal information, to rectify your personal information, to erase your personal information, to restrict processing some of or all of your personal information. If you wish to exercise any of the above mentioned rights, please email us at info@pifis.hu or write to us at PIFIS – 47 Váci utca, Budapest, Hungary, H-1056. We will make every effort to fulfill your request to the extent allowed by law and will respond in writing within 30 calendar days of receiving your request.

Should you wish to request help from the relevant Hungarian authority, their details are as follows:

Name: National Authority for Data Protection and Freedom of Information (NAIH) Address: 22/c Szilágyi Erzsébet fasor, Budapest, Hungary, H-1125. E-mail: ugyfelszolgalat@naih.hu

## 9. Data retention policy

PIFIS retains personal data of students until the individual asks us to remove it from our records. We routinely remind you of your right to have us remove your personal data.

# 10. Data security

We at PIFIS are committed to holding your data securely. All of your data are held securely and in accordance with the relevant data privacy laws and our internal policies. We do not sell or rent to or trade your data with any other organizations. Although most of the information we process and store stays within Hungary, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if one of our trusted partners' or data processors' servers are located in a country outside the EEA, however, you can rest assured, they provide an adequate level of protection in accordance with EU data protection law.

In order to protect the personal and medical information the Preparatory Institution for International Students Ltd. as data controller, performs the following security measures:

The paper based personal information is kept securely and we take precautionary actions to protect them – from loss, unauthorized use or modification. The documents are kept is a well-lockable dry room; the building is equipped with a safeguarding system. The personal data may only be accessed by authorized people, third parties must not have access to them. The data controller can only leave the above-mentioned room by closing it.

The digitally stored documents are under IT protection. Unauthorized people cannot access the data stored on the personal computers, they can only be accessed with username and password. The central server can only be accessed with proper authorization and only by the assigned people. In order to protect the digitally stored data, we use backups and archiving. The computers used to control the personal data are equipped with anti-virus software. To avoid data loss, the computers used to display data are under regular maintenance. Access from outside the office is prevented by a firewall, which will stop all unlawful try of invasion.

Effective: 24 May 2018 Last modification: 14 November 2018