

Supplementary Data Management Policy **for managing personal data at European Power Services Zrt.** **in adult education**

Based on Articles 13 and 14 of the Regulation (EU) 2016/679 (April 27, 2016) of the European Parliament and of the Council (hereinafter: GDPR), on the protection of natural persons with regard to the processing of personal data and the free movement of personal data, and repealing of the EC Regulation 95/46, the controller of data under this Notice, provides the following information for the Data Subjects, on the management of personal data.

European Power Services Zrt. provides adult training for the contributors of employee and business partners (together: the Data Subjects) at several locations, based on the provisions of the Act LXXVI of 2013 on Adult Education (hereinafter: Fktv.). In the context of the activities of the Controller, various education and training programs are provided, targeted on competency building and competency development.

The present Data Management Notice applies to the data management related to the **adult education** activities provided for the **natural persons Data Subjects**.

1. The Data Controller

The Data Controller is:	European Power Services Zrt. (hereinafter referred to as: Controller)
Registered seat:	1037 Budapest, Montevideo utca 3/A. 3.em/34:
Mailing address:	1037 Budapest, Montevideo utca 3/A. 3.em/34:
Webpage:	www.eupowers.hu
E-mail address:	iroda@eupowers.hu
Telephone number:	+36 20366 2987
Data Protection Officer:	dr. Flóra Józán (dpo@mvm.hu)

For the purposes of this Notice, any information regarding an identified or identifiable natural person (the **Data Subject**), is considered as personal data. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier (such as a name, an identification number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. With regard to this data management, a Data Subject is a natural person, who applies for, or takes part, in adult education.

2. Main legislation regarding this data management

- Regulation 2016/679 of the European Parliament and of the Council (EU) (April 27, 2016), on the protection of natural persons with regard to the processing of personal data and the free movement of personal data, and repealing of the EC Regulation 95/46 (General Data Protection Regulation, GDPR)
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information
- Act LXXVII of 2013 on Adult Education (Fktv.)

3. Legal basis of data management

Article 6 (1) (c) of the GDPR (fulfilment of a legal obligation to bodies empowered by law in accordance with the provisions of Act LXXVII of 2013 on Adult Education).

4. The purpose of data management

Conducting adult training by the Controller – in accordance with the legal provisions.

5. Scope of data processed

Designation of data ranges	Why is it necessary?
Name	Necessary for the organisation of the training, and identification of presence.
Birth date	Necessary for distinguishing multiple employees with the same name, and identification of presence at the training.
Telephone number	Necessary for the organisation of the training, making appointments, and for contact.
Employer's name	Necessary for identification of the employer enrolling the person for training
Course title	Necessary for the identification of the training provided.
Personal data managed by the Controller, providing adult training as per Fktv. (See Annex)	Necessary to fulfil registration and reporting obligations required by Fktv.

Source of managed data: Directly from the Data Subject.

6. Personnel authorized to access the data

Designation of recipients	Purpose of communication
<p>Data processor(s): MVMI Informatika Zrt. Registered seat: 7030 Paks, Vasút utca 1. Commercial Registry Number: 17 10 001240</p>	<p>Provision of IT services, storage of data for the Controller</p>
<p>Independent data controller(s): Entities qualified by law</p> <p>MVM Zrt. Registered seat: 1031 Budapest, Szentendrei út 207-209. Commercial Registry Number: 01-10-041828</p>	<p>The reason for the data transfers is that the adult training service providers, according to the provisions of Act LXXVII of 2013 on Adult Education, are obliged to provide data to the entities qualified by law.</p> <p>Provision of group level HR activities in the MVM group of undertakings.</p>

In principle, the personal data of the Data Subject can be seen by the employees of the Data Controller, in order to perform their tasks related to the purpose of data management. Personal data are forwarded to the above **Recipients**.

The Data Controller transfers the personal data of the Data Subject to government organizations in exceptional cases only. For example, if a court case is started in the ongoing legal dispute between the Data Subject and the Data Controller and the transfer of the documents containing the personal data of the Data Subject is required by the acting court and the police contact, the Data Controller to require the transfer of the documents with the personal data of the data subject for the investigation. In addition the personal data are also disclosed to the lawyer acting as the legal representative of the Data Controller if there is a legal dispute between the Data Subject and the Data Controller.

7. Duration of data management

Eight (8) years from the date of conclusion of the adult training contract.

8. Others

Data Controllers **do not transfer** personal data to **third countries or to international organisations.**

During the processing of the above detailed personal data, the **Data Controller shall not perform automated decision-making or profiling.**

You are informed that the above data management is part of the data management of the Data Controller's employees, or the processing of the data contributed by the business partners, and therefore, in addition to what is contained in this Supplementary Data Management Notice, further detailed information on the management of your personal data by the Data Controller is contained in the Data Controller's general data management information for employees, or the data management information for the data contributed by the business partners, on the website of the Data Controller.

The content of this Supplementary Data Management Notice is part of the above referred information, shall be used cumulatively, thus on matters not mentioned specifically (e.g. data security, rights and possible remedies related to data management, etc.), detailed information is provided in the above referred data management information.

Annex

Example data sheet – for adult training

(based on registration and reporting obligations required by Fktv., from the entity providing adult training)

PLEASE COMPLETE LEGIBLY IN BLOCK LETTERS, USING AUTHENTIC DATA!	
Name	
Birth name	
Mother's name	
Place of birth	
Birth date	
E-mail address	
Phone number:	
Education ID <i>(if you have one / know it)</i>	
Highest completed level of education (please mark the correct answer with an X)	
No qualification	
Basic education	
Secondary education and high school graduation (grammar school)	
Secondary education and secondary vocational qualification (vocational grammar school, vocational school, vocational school)	
Secondary education and secondary vocational qualification (technical school)	
Higher education level and higher professional qualification (higher education institution)	
Higher vocational education (higher education institution)	
Other professional qualifications/skills	
Language skills	

The above details are accurate, I certify their authenticity with my signature, and I take note that the adult education Data Controller manages my personal data, related to the adult education, according to the Supplementary Data Management Notice, available at <https://eupowers.hu/>.

Date: _____

Signature: _____