



# EDUBASE

## Privacy Policy

EduBase Educational Services Limited Liability Company

Last revision: 20<sup>th</sup> May 2018

This Privacy Policy applies to all personal data you provide to us and also to all personal data which we collect on you, either about how you use our website (using cookies) or about the pattern of your activity if you use our services.

### 1. Who we are

**EduBase LLC** ("EduBase" or "we" or "us") (registered seat: Hungary, 1046 Budapest, Pálya street 24. 4/20; company registration number: 01-09-284426) acts as a data controller. It means EduBase decides how your personal data is processed and for what purposes.

As a data controller, EduBase is registered by the Hungarian National Authority for Data Protection and Freedom of Information ("NAIH") (the registration number related to direct marketing is NAIH-121257/2017, and the registration number related to database development is NAIH-121164/2017).

### 2. How to contact us

#### 2.1. Contact details of EduBase

In respect of data protection related questions, to exercise your rights or file a complaint, please contact the Data Protection Officer by sending an email to the email address set forth below. You may alternatively contact us by sending a postal mail to the following address or choosing the relevant icon in the Contact menu after logging in to your EduBase account.

## 2.2. Contact details of EduBase's Data Protection Officer

EduBase has appointed a Data Protection Officer (DPO) in order to protect your rights and to increase the security of the processing of your data, to whom you can turn with your questions.

Contact details of the DPO:

E-mail: [dpo@edubase.net](mailto:dpo@edubase.net)

Postal address: Hungary, 1046 Budapest, Pálya street 24. 4/20

Attn.: DPO; EduBase

## 3. Your personal data

### — What is it?

Personal data relates to a living individual who can clearly be identified from that data, in particular your name, address, phone number, e-mail address, credit or bank card number. Identification can be made by the information alone or in conjunction with any other information otherwise in the data controller's possession or likely to come into such possession.

### Controlling of personal data of minors under 16

The consent of minors under the age of 16 and the statement of consent of users who are legally incapable shall be expressly given by their legal representatives. The consent of minors over the age of 16 shall be considered valid without the valid permission or subsequent approval of their legal representative.

## 4. How do we collect personal data?

We collect your data on our website, via email and post.

## 5. Why do we collect personal data?

### — Data processing purposes

We collect and use your personal data for the following purposes:

- 5.1. A) For the purpose of the **use of the EduBase testing services** we collect the following data of our registered users: full name, user name, email, gender, date of birth, educational institution, profile picture, IP address.

- B) If you use our service **without registration**, we collect the following information for this purpose:
- Answers
  - Quiz activity (e.g. time, task switching)
  - Results
  - Custom data may be collected by the test creator (using custom fields)
- C) We expressly note, that one of the most important features of EduBase website is that we carry out profiling in the course of the use of the website and testing as described in Section 6. For this purpose we collect the following data:
- information about you;
  - information about the services purchased by you;
  - information referring to the device used by you;
    - the IP addresses of devices
    - display resolution of devices, operating system and type of browser used
    - type of device
    - geographical location
    - preferred language
  - details of data generated by using the Service;
    - place and time of accessing the Service
    - the contents viewed during the use of the Service and the time of their viewing
    - the keyboard and mouse interaction carried out on the Webpage
    - your subscriptions, memberships, user rights, letters and searches within the Service
  - mandatory data given during registration;
    - your full name
    - your email address
    - your gender
  - data which may be disclosed voluntarily in the course of the registration;
    - date of birth
    - place and time of completion of studies
  - details about your access and use of our Webpage and mobile applications; and
  - the details of contacting us and our colleagues.

5.2.

To **deliver the services you have purchased** from us, for this purpose we collect the following data:

- Customer Email
- Customer Name
- Customer IP Address
- Customer Gender
- Customer Address (if provided)

5.3.

To **communicate** with you (for example in the event of service disruption). For this purpose we collect the following data: name and contact details.

5.4.

To send you **notifications on tests**. For this purpose we collect the following data: name, e-mail, whether the user is a newsletter subscriber, selected services, language of the site.

- 5.5. To send you **newsletters**. For this purpose we collect the following data: name and contact details, details of your historical searches.
- 5.6. To **provide offers tailored to your preferences**. For this purpose we collect the following data: name and contact details, details of your historical searches and historic details of the use of EduBase website.
- 5.7. To communicate with you to **carry out customer satisfaction survey** for analytical purposes, for quality improvements, for service developments, to improve the performance of the website, to measure the success of our advertising campaigns or to tailor services to your needs. For this purpose we collect the following data: name and contact details and historic details of the use of EduBase website.
- 5.8. To **support administrative and legal purposes** for example anti-fraud screening, for safety and security purposes. For this purpose we collect the following data: user name, address, phone number, IP address, geolocation data, registration, use and transaction history, credit/debit card details.
- 5.9. To **comply with the mandatory provisions of the applicable laws**. For this purpose we collect personal data related to invoicing.
- 5.10. If you ask so, we publish the number of EduBase clips what you have earned based on your usage statistics on the Rankings site, for this purpose, we collect the following data: name, username, profile picture.

## 6. Profiling

Based on your consent we perform profiling in order to provide you with the adequate service in respect of testing and to provide you with offers tailored to your needs, preferences and interests. Offers might include inter alia discounts on premium services, discounts on other services, special voucher offers provided in exchange of participation in surveys. Offers might mean offers of EduBase or any of our contracted partners or other third persons. The offers might be provided via email or onsite notifications.

Profiling is any form of automated processing of your personal data consisting of the use of personal data to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning economic situation, health, personal preferences, interests, reliability, behaviour, location or movements of you.

## 7. Legal basis of data processing

The legal basis of data processing activities indicated in point 5.1./A, 5.2 - 5.4. of Section 5 of this Privacy Policy lies in Subsection (a) Paragraph (1) of Article 5 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter the "**Freedom of information Act**"), i.e. based on your consent, and commencing from 25 May 2018 also Article 6 (1) (b) of the General Data Protection Regulation (Regulation No. 2016/679 of the European Parliament and of the Council) ("**GDPR**"), i.e. such processing activities are necessary for the performance of contract or in order to take steps at the request of data subject to entering into a contract.

The legal basis of data processing activities indicated in point 5.1./B, 5.1./C, 5.5 - 5.6., 5.10. of Section 5 of this Privacy Policy lies in Subsection (a) Paragraph (1) of Article 5 and Subsection (a) Paragraph (2) of Article 5 of the Freedom of information Act, i.e. based on your consent, and commencing from 25 May

2018 also Article 6 (1) (a) and Article 9 (2) (a) of the GDPR, i.e. such processing activities will be based on your consent.

The legal basis of data processing activity indicated in point 5.7 - 5.8. of Section 5 of this Privacy Policy lies in Subsection (a) Paragraph (5) of Article 6 of the Freedom of information Act, i.e. based on your consent, and commencing from 25 May 2018 also Article 6 (1) (f) of the GDPR, i.e. such processing activity will be based on EduBase's the legitimate interest. If the legal basis is the legitimate interest of EduBase, we will carefully consider your interests and fundamental rights and freedoms, and whether these override such legitimate interests (balancing test).

The legal basis of data processing activity indicated in point 5.9. of Section 5 of this Privacy Policy lies in Subsection (b) Paragraph (1) of Article 5 and Subsection (a) Paragraph (5) of Article 6 of the Freedom of information Act, i.e. based on your consent, and commencing from 25 May 2018 also Article 6 (1) (c) of the GDPR, i.e. such processing activity is necessary for compliance with legal obligation(s).

## Consequences of refusal/failure of providing personal data

Please be aware that we need the personal data listed in Section 5 5.1. in order to perform the General Terms and Conditions and provide you with our services. If you do not provide us with the requested personal data we will not be able to provide you with all or parts of the services you have requested.

## 8. How long do we keep your personal data?

We process your personal data for the time required consistent with the purposes set out in this Privacy Policy or for the period of limitation prescribed in the relevant laws.

We keep your personal data for no longer than reasonably necessary: for a period of 6 years from the fulfilment of the contract concluded with us (i.e. deletion of your EduBase account) in order to comply with applicable data retention laws.

We store internet search data collected concerning you for 1826 days.

In case of accounting documents, the retention period is 8 years from the closing of the financial year, in accordance with Section 169 of Act C of 2000 on Accounting.

If a court or disciplinary procedure is initiated, then the personal data will be retained until the termination of the proceedings, including the duration of any possible remedy, which data thereafter, in the case of civil claims, will be deleted after the civil law statute of limitation runs.

In the case of consent-based data processing, personal data will be processed until the consent is withdrawn.

## 9. Further processing of personal data

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, we will provide you with a new notice explaining all condition relating to the new processing prior to the new processing takes place. If required, we will seek your consent before commencing the new data processing activity.

## 10. Your personal data protection rights

Pursuant to the applicable data protection law you may have the right

1. to request access to your personal data,
2. to request rectification of your personal data,
3. to request erasure of your personal data,
4. to request restriction of processing of your personal data,
5. to request data portability,
6. to object to the processing of your personal data (including objection to profiling; also other rights in connection with automated decision-making),
7. to withdraw your consent, and to lodge a complaint with the supervisory authority.

### 10.1. Right to access

You may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data.

10.2. You may have the right to obtain a copy of the personal data undergoing processing. We may request additional information from you for identification or for further copies requested by you, we may charge a reasonable fee based on administrative costs

### 10.3. Right to rectification

You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### 10.4. Right to erasure ("right to be forgotten")

Under certain circumstances you may have the right to request from us the erasure of your personal data and we may be obliged to erase such personal data. In such cases we will not be able to further provide you with our services.

### 10.5. Right to restrict processing

Under certain circumstances you may have the right to request from us the restriction of processing your personal data. In this case the respective data will be marked and may only be processed by us for certain purposes.

### 10.6. Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we can be required to no longer process your personal data.

Moreover, if your personal data is processed based on our legitimate interest, you have the right to object at any time to the processing of personal data concerning you for such purpose.

Furthermore, under certain circumstances in case of automated individual decision-making, you have the right to obtain human intervention. We inform you that EduBase does not apply automated decision-making mechanism.

## 10.7. Right to data portability

Under certain circumstances you may have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format (i.e. in digital form) and you may have the right to request the transmission of those data to another entity without hindrance from us, if such transmission is technically feasible.

## 10.8. Right to withdraw consent

When the processing of your personal data is based on your consent, you can withdraw your consent at any time without giving any reason to us, free of charge by clicking the link provided in each newsletter, or via changing preferences in your EduBase account. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you withdraw your consent to our processing your personal data, we may not be able to provide all or parts of the services which you have requested.

## 10.9. Right to legal remedies and to lodge a complaint with the supervisory authority

If you feel that your personal data rights have been breached, you can also contact and lodge a complaint with the local data protection authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

You may also pursue legal remedies at the competent courts in particular the competent court under your place of residence or place of stay and contact the Hungarian Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság, H-1125, Hungary, Budapest, Szilágyi Erzsébet fasor 22/C.; telephone: +36-1 391-1400; telefax: +36-1 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

# 11. How do we protect your personal data?

EduBase complies with its obligations under the applicable data protection laws by

- keeping personal data up to date;
- storing and destroying it securely;
- not collecting or retaining excessive amounts of data;
- protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We take appropriate technical and organizational measures to ensure the protection of your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, in particular but not limited to where the processing involves the transmission of data over a network, and against all other unlawful forms of processing.

EduBase, in line with this, among other things, applies different levels of access rights to the data, which ensures that only the appropriate authorized person has accesses to the data, whose knowledge of the data is necessary to fulfil his or her obligation arising out of or in connection with the performance of his or her job.

We pay special attention to the safe transmission of the personal and financial data. This data is transmitted from your computer to the booking server of EduBase through encrypted channels with the support of the state-of-the-art Secure Socket Layer (SSL) technology.

## 12. Sharing your personal data

12.1. EduBase, in the course of its operation, may utilize the services of various data processors and external service providers to handle and process your personal data for specific purposes, on behalf of and in accordance with the instructions of EduBase.

The data processors shall process the personal data at the most as long as the term of the data processing contract concluded with them is valid and in force, or until they are required to keep your data under the applicable data retention laws.

We may disclose your personal data to the following categories of third parties (recipients) for the purposes described below:

- credit card companies, payment service providers to process the payments you initiated on our website;
- third parties running customer surveys on our behalf;
- other third party service providers involved by us for data processing, Gravatar for example, which is a global avatar service.
- third parties, such as law firms, courts, other bodies or service providers in order to enforce or apply any contract with you;
- IT services;
- government authorities or enforcement bodies such as the police and regulatory authorities, upon their request and only as required by the applicable law or to protect our rights or the safety of our customers, staff and assets.

## 12.2. Third party service providers

When you purchase the service of a third party service provider on our website, we will transfer your personal data to the respective service provider to facilitate such purchase.

The data processing of such third parties may also be governed by their own privacy policies. Please review the privacy policies on the website of such third parties directly for more information about their data processing practices.



### 12.3. Data Processors

EduBase engages certain third parties to provide assistance during the performance of the services bought from us. Such third parties provide the following services:

- payment processing services;
- provision of IT support services and social login services.

### 12.4. Government authorities and enforcement bodies

We may transfer your personal data to government authorities or enforcement bodies such as the police and regulatory authorities, upon their request and only as required by applicable law; or to protect our rights or the safety of our customers, staff and assets.

## 13. Transferring your personal data to third countries

The transfer of your personal data outside of the European Economic Area may be necessary in order to provide you with a service that you have requested, and your personal data may be accessed by service providers from countries that do not provide the same level of data protection as provided in the European Economic Area. Therefore, EduBase will, if necessary, take all measures which in relation to the recipients of your personal data, is necessary to ensure an adequate level of protection as defined by the applicable data protection law, in particular through the application of the Standard Contractual Clauses issued by the European Commission or by a decision of the European Commission which states that the country in which the recipient of the transferred data is provides an adequate level of data protection.

If, in relation to data transfers abroad, an adequate level of protection of personal data cannot be ensured, then we shall request your express consent relating to any such data transfers abroad. Please note that such data transfers may be associated with certain risks particularly that in the country of the data recipient unauthorized third parties may also have unreasonable access to said data and you may not be able to exercise the rights of the data subject and or your right to object against acts that may harm your personal data and your right to privacy.

You can find on the website among the origins and destinations the third countries where your personal data may be transferred, or the same may be accessed from, based on your travel destination.

## 14. Cookies

14.1. Besides the aforementioned, in order to enrich user-experience the Service Provider uses cookies as well. Cookies are sets of information consisting of letters and/or numbers which are sent by web servers to the Client's browser at the first visit of websites. With the help of cookies websites will subsequently recognize that the Client has already visited the site, thus they can provide personalized usage for the Client. Furthermore, cookies collect information about the use of the respective website. Websites often use cookies for storing data which operate uniformly at different parts of the website (for example personalized pages). Cookies also give the possibility not to register every time you visit a certain website.

The Service Provider uses the following cookies on its Webpage:

Type and name of cookie	Functioning of cookies	Lifespan of cookies
<i>persistent cookie, user</i>	with its help the system keeps the visitor logged in	30 days
<i>persistent cookie, authenticator</i>	authenticates trusted devices in case of 2FA	180 days
<i>session cookie, cookies</i>	it can be verified whether cookies are permitted	session

## Cookie stop

The Client may check and delete the cookies stored on his or her computer, and with the help of the web browser settings the Client may control the way these are used. You can get further information about this from the manufacturer or from the 'Help' function of your web browser. By disabling the cookies the functions of the Webpage will be restricted.

14.2.

Until you log in to your EduBase account, the use of such data will be in pseudonymized form. That means we will replace your name and other features which may identify you with another identifier in order to make it impossible to identify you as a person and we will not bundle such usage profiles with other data we store about you. Once you are logged in your EduBase account, the use of such data for the purposes described in the preceding sentence will be personalized and connected to you.

The EduBase automatically collects certain technical data in the course of each visit (as detailed below) which cannot be directly associated with you. However, in certain cases these technical data may be considered personal data. Edubase uses these technical data to the extent to which it is needed for the operation of its webpage and its protection against attacks and abuses. Furthermore, EduBase uses the technical data in pseudonymized or anonymized forms for statistical purposes. EduBase always manages technical data separately from real, personal data.

You are entitled to object against the use of your data for building usage profiles as described above at any time.

We may also transfer your non-personally identifiable data such as, but not limited to, anonymous demographic information and online behaviour to our contracted partners (e.g. third party service providers) for the purpose of market research. "Non-personally identifiable data" in this respect means we modify your personal data so that the information concerning personal or material circumstances cannot be attributed to you or that such attribution would require a disproportionate amount of time, expense and effort. We store data sent by your browser and device to our website during the reservation process. No such data will be disclosed to third parties except in aggregate, non-personally identifiable forms.

## 15. The use of your personal data for marketing purposes

We send you newsletters on actual bargains and special offers if you have requested such communication from us by subscribing to such services, or if you provided us with your details. We will not contact you electronically for marketing purposes unless you have expressly indicated your consent by ticking relevant tick boxes on the data entry form in which you entered your contact information.

## 16. Changes to our Privacy Policy

If we change this Privacy Policy, we will publish the updated version of it on our website, [www.edubase.net](http://www.edubase.net)

## 17. Third party websites

The edubase.net website provides links to other websites for your convenience and information. Please be aware that these sites may be owned and run by other companies and organizations and have different security and privacy policies. EduBase has no control over and takes no responsibility for any information, material, products or services contained on or accessible through those websites.

## 18. Third parties liability

EduBase is not responsible for third parties' use of your data, where such use is permitted for their own purposes. In such cases these third parties also be considered data controllers, please consult their privacy policies for further information.

This Privacy Policy is effective from **20<sup>th</sup> May 2018**.