Privacy notice
in relation to reporting in the abuse-reporting system

The PannonDiák Iskolaszövetkezet (registered seat: 8000 Székesfehérvár, Berényi út 72-100., represented by: Chairperson of the Board of Directors: Touré Fatime, e-mail address: info@pannondiak.hu, tel.: +36 22 533 333, +36 22 554 170, name and contact details of the data protection officer: Dr. Bölcskei Krisztián, available by post at the Data Controller's registered office) and operator of the whistleblowing system, the Adatvédelmi Auditor Kft. (székhely: 2120 Dunakeszi, Kacsóh Pongrác utca 9. fszt. 4., cégjegyzékszám: 13-09-224835, adószám: 32179015-2-13, e-mail-ben az: info@adatvedelmiauditor.hu) hereby fulfils the obligation to provide prior information in relation to the processing of personal data in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter "GDPR") in relation to the processing of the following data.

In the interests of transparent information

- data management is tabulated,
- a separate chapter contains a general description of the organisational and technical measures taken in relation to data security,
- details of your rights and the exercise of your rights can be found at the end of this privacy notice.

The data controller:	**Adatvédelmi Auditor Kft. (headquarters: 2120 Dunakeszi, Kacsóh Pongrác utca 9. fszt. 4, company registration number: 13-09-224835, tax number: 32179015-2-13, e-mail: info@adatvedelmiauditor.hu)** **If the report is received by Pannonjob Human Services and Consulting Kft. and/or is included in the investigation, PannonDiák Iskolaszövetkezet will also become an independent data controller.**
Name of the data processing:	**processing of data in connection with the report to the abuse-reporting (whistleblowing) system**
What is the purpose of the processing?	• investigate the correctness of the report and remedy or end the conduct that is the subject of the report • compatible contacts related to this objective • meeting legal obligations
Who are the data subjects?	• any natural person who can be identified on the basis of the data recorded in the report (e.g. report filler, person concerned in the report, witness) In connection with the report, the Data Controller shall also process the personal data of following people in concern: • recipient of the report • case handler

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Who/what is the source of the data?	All who is concerned	
What are the categories and scope of the data processed?	**What is the purpose of each data category or round?**	**What is the legal basis for processing?**
personal data strictly necessary for the investigation of the report: the specific set of data may vary from one reporting channel to another, and therefore from one report to another, but typically the data that allows the identification of the reporter, the person concerned by the report, the identity of the person who may have information about the report, such as name, e-mail address, telephone number, time, manner, content, sound file, etc. content of the report date and method of the report contact details	• investigating the correctness of the report • to contact	to comply with a legal obligation (Article 6(1)(c) GDPR) under the provisions of Act XXV of 2023, because the Data Controller is required to operate an abuse reporting system.
How long does the processing last?	• until cancellation if omitted • for the duration of the investigation, if no proceedings are opened • if proceedings have been initiated, until the final conclusion of the proceedings initiated on the basis of the report	
Is there any communication (access, transfer, transmission) of data to third parties?	Depending on who receives the report (PannonDiák Iskolaszövetkezet or the operator Adatvédelmi Auditor Kft.), and how PannonDiák Iskolaszövetkezet is involved in the investigation, data may be transferred • for the Adatvédelmi Auditor Iskolaszövetkezet operating the abuse reporting (whistleblowing) system (on behalf of PannonDiák Iskolaszövetkezet), and/or • for the minimum number of authorized employees of PannonDiák Iskolaszövetkezet necessary to conduct the investigation (on behalf of Adatvédelmi Auditor Iskolaszövetkezet) Data may be transferred in addition to the above: • to public authority, court, legal representative, data protection officer, if necessary	
Is there a data processor involved?	In case of the report handeld in via the Internet, Neosoft Kft. (8000 Székesfehérvár, Távirda utca 2. A. building 2. floor 1. door), in case of e-mail registration with the Company, for server service reasons, VIDEOTON	

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	HOLDING ZRt. (8000 Székesfehérvár, Berényi út 72-100.)
Is there automated decision-making, profiling?	No there is not.
Who is entitled to access the data?	the persons receiving the report, the persons carrying out the investigation (so-called case handlers), the department or member of staff strictly necessary for the conduct of the investigation

How does the Data Controller ensure data protection?

The Data Controller shall ensure the security of the data. To this end, he/she shall take the technical and organisational measures and establish the procedural rules necessary to enforce the applicable laws, data protection and confidentiality rules.

The Data Controller shall take appropriate measures to protect the data against unauthorised access, alteration, forwarding, disclosure, deletion or destruction, accidental destruction or damage and against inaccessibility resulting from changes in the technology used.

The Data Controller (also) ensures the enforcement of data security rules through internal policies, instructions and procedures.

When determining and applying measures to ensure the security of data, the controller shall take into account the state of the technology and shall choose among several possible processing solutions the one which ensures a higher level of protection of personal data, unless this would involve a disproportionate effort.

The Data Controller shall ensure, in particular, in the context of its IT security responsibilities:

- the denial of access by unauthorised persons to the tools used for data management (hereinafter referred to as the 'data management system'),
- preventing the unauthorised reading, copying, modification or removal of data carrier,
- to prevent the unauthorised input of personal data into the processing system and the unauthorised access, modification or deletion of personal data stored in the processing system,
- preventing the use of the processing systems by unauthorised persons by means of data transmission equipment,
- that persons authorised to use the processing system have access only to the personal data specified in the access authorisation,
- that it is possible to verify and establish to which recipients the personal data have been or may be transmitted or made available by means of a data transmission installation,
- that it is subsequently verifiable and ascertainable which personal data have been entered into the system by whom, at what time,
- preventing unauthorised access to, copying, modification or deletion of personal data during transmission or transport of the data carrier,

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- that the data management system is operational, that any errors in its operation are reported and that the personal data stored cannot be altered even if the system is not functioning properly.

What are the rights of the people who are involved and how can they exercise them?

The following table shows the relationship between the data subject's rights and the legal basis, so that it is clear to the data subject what rights he or she can exercise under the legal basis used.

	Right to prior information	Right of access	Right of rectification	Right of erasure	Restriction	Data portability	Objection	Withdrawal of consent
Contribution	✓	✓	✓	✓	✓	✓	✕	✓
Agreement	✓	✓	✓	✓	✓	✓	✕	✕
Legal obligation	✓	✓	✓	✕	✓	✕	✕	✕
Vital interest	✓	✓	✓	✓	✓	✕	✕	✕
Public task, public right.	✓	✓	✓	✕	✓	✕	✓	✕
Legitimate interest	✓	✓	✓	✓	✓	✕	✓	✕

Right of access (Article 15 GDPR)
The data subject shall have the right to obtain from the Data Controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and information about the circumstances of the processing. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards for the transfer in accordance with Article 46. The Controller shall provide the data subject with a copy of the personal data which are the subject of the processing, if the data subject so requests.

Right to withdraw consent (Article 7 GDPR)
The data subject has the right to withdraw your consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

Right to rectification (Article 16 GDPR)
The data subject shall have the right to obtain, at his or her request and without undue delay, the rectification by the controller of inaccurate personal data relating to him or her.

Right to object (Article 21 GDPR)
The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of Article 6(1)(e) or (f) of the GDPR.
In such a case, the Controller may no longer process the personal data, unless it can demonstrate legitimate grounds for the processing which override the interests, rights and freedoms of the data subject.

Right to restriction of data processing (Article 18 GDPR)
The data subject shall have the right to obtain, at his or her request, the restriction of processing by the controller if any of the conditions set out in the GDPR are met, in which case the controller shall not perform any operation on the data other than storage.

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Where the data subject has objected to the processing; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject.

Right to erasure (right to be forgotten) (Article 17 GDPR)
The data subject shall have the right to obtain the erasure of personal data concerning him or her without undue delay where the processing has no purpose, the data subject has withdrawn his or her consent and there is no other legal basis for the processing, there is no legitimate ground for processing which overrides the law in the event of an objection, the data have been processed unlawfully or the data must be erased in order to comply with a legal obligation. Where the controller has disclosed the personal data and is under an obligation to erase it, it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the controllers that process the data that the data subject has requested the deletion of the links to or copies or replicas of the personal data in question.

Right to data portability (Article 20 GDPR)
The data subject shall have the right to receive the personal data concerning him or her which he or she has provided to the Data Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance from the controller to which he or she has provided the personal data, if legal conditions (automated processing and legal basis for consent or agreement) are met.

Where and how can data subjects request detailed information about the processing and transfer of their data, and where and how can they exercise their rights?
The Data Controller draws the attention of the data subjects to the fact that they may request information, exercise their right of access and exercise their other rights by sending a statement to the Data Controller or the Data Protection Officer by post or e-mail. The Data Controller will examine and reply to the statement as soon as possible after receipt and will take the necessary steps as provided for in the statement, the Internal Privacy Policy and the law.

How to contact the authority in the event of a complaint (Article 77 GDPR):
Nemzeti Adatvédelmi és Információszabadság Hatóság
Address 1055 Budapest, Falk Miksa utca 9-11.
Mailing address: 1363 Budapest, Pf. 9.
Telephone: +36 (1) 391-1400
Fax: +36 (1) 391-1410
www: http://www.naih.hu
e-mail: ugyfelszolgalat@naih.hu

For more information about your rights and details of how to complain to the Authority, please visit: http://naih.hu/panaszuegyintezes-rendje.html.

In the event of a breach of their rights, the data subject can also go to court in their place of residence and claim, among other things, damages.

You can contact the court in your place of residence here: https://birosag.hu/birosag-kereso

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