

## **“COMPETENCE CARD” and to use related services**

One of QFD Group Kft.'s main areas of activity is the provision of various training services.

Participants in the training programs are mostly employees, but in certain cases, they may also participate in their capacity as non-employees.

QFD Group Kft. aims to provide discounts to applicants for specific training courses provided certain conditions (see the Regulations referenced below) are met. Applicants for training courses may avail themselves of these discounts by applying for the so-called COMPETENCE CARD issued and made available by QFD Group Kft.

In connection with the application for the COMPETENCE CARD and related services, QFD Group Kft. issues this data processing notice (hereinafter: “**Notice**”).

The terms and conditions for applying for the COMPETENCE CARD and a detailed description of the service (hereinafter: “**COMPETENCE CARD Terms and Conditions**”) are available on the QFD Group Kft. website:

<https://qfdgroup.com/kompetenciakartya>

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The purpose of this Notice is to provide information regarding data processing by the Data Controller in connection with the COMPETENCE CARD.

### **1. Data Controller's details**

Name: **QFD Group Limited Liability Company**

Registered office: 2330 Dunaharaszti, Sisak Street 3

Email: info@qfdgroup.com

(hereinafter: “Data Controller”)

### **2. Purpose and Scope of Data Processing**

- a. The Data Controller processes personal data obtained in connection with the application for the COMPETENCE CARD and the use of related services, respecting the rights of data subjects regarding their personal data and only in accordance with the law,
  - i. to enable the use of discounts related to training services, as well as
  - ii. to verify eligibility for the discount.
- b. The purpose of data processing is also:
  - i. to maintain the security of the IT system;
  - ii. to prevent abuse;
  - iii. monitoring the operation of the service and ensuring its auditability;
- c. Data processing as described in this Notice is governed by applicable laws, in particular:
  - i. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, “GDPR”); and
  - ii. Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (“Info Act”)
- d. The discounts available under the COMPETENCE CARD are subject to the Data Subject applying for the COMPETENCE CARD.

- e. By applying, the Data Subject acknowledges that they have read the COMPETENCE CARD Terms and Conditions and the Information Notice, accept the contents thereof, and wish to apply for the COMPETENCE CARD.
- f. In order to provide the benefits offered by the COMPETENCE CARD, it is essential that the Data Controller process certain personal data of the Data Subject; therefore, data processing takes place in this context.

### 3. The legal basis for data processing

- a. the Data Subject's consent pursuant to Article 6(1)(a) of the GDPR;
- b. the Data Controller's legitimate interest pursuant to Article 6(1)(f) of the GDPR with regard to the processing of logged data and ensuring IT security;
- c. The Data Controller's legitimate interest, in particular:
  - i. the secure operation of the service
  - ii. preventing abuse
  - iii. detecting unauthorized access
  - iv. monitoring the operation of the system

### 4. Definitions

- a. **Data Subject:** any natural person identified or identifiable based on any information, including a person who, by applying for a COMPETENCE CARD, wishes to avail themselves of a discount in connection with the given service and in respect of whom the Data Controller processes personal data as necessary;
- b. **Personal data:** any information relating to the data subject—such as name or contact details—on the basis of which the data subject can be identified directly or indirectly (i.e., in combination with other information).
- c. **Data Controller:** see the details of QFD Group Kft. above.
- d. **Data processing:** any operation or set of operations performed on data, regardless of the method used, including in particular collection, recording, organization, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, blocking, erasure, and destruction, as well as the prevention of further use of the data, the taking of photographs, audio, or video recordings, and the recording of physical characteristics suitable for identifying a person (e.g., fingerprints or palm prints, DNA samples, iris images);
- e. **Data Processor:** a person who, within the framework and under the conditions set forth by law or in a binding legal act of the European Union, processes personal data on behalf of or pursuant to the instructions of the Data Controller;

### 5. Scope of processed data

- a. The following data provided when applying for previous training courses offered by the Data Controller, for the purpose of verifying the eligibility requirements for applying for the COMPETENCE CARD:
  - i. the data subject's full name;
  - ii. the name and tax identification number of the data subject's employer;
  - iii. the data subject's workplace email address and phone number—or, in the absence of an employer or as an option, their personal email address and phone number.
- b. Data provided by the data subject when applying for the COMPETENCE CARD:
  - i. full name;
  - ii. the name and tax ID number of the data subject's employer;
  - iii. the data subject's work email address and phone number—or, in the absence of an employer, their personal email address and phone number.
- c. Log data:
  - i. The Data Controller's system automatically records the following data:
    - A. time of login;

- B. the URLs and timestamps of page loads during the user session;
- C. the type of device used ("user agent");
- D. if necessary, the IP address for tracking security incidents;

This data alone is not necessarily suitable for directly identifying the data subject, but when combined with other data, it may become personal data.

d. The processing of logged data is based on the Data Controller's legitimate interest in ensuring that the service is secure, uninterrupted, and lawful.

i. Definition of legitimate interest

- A. Secure operation of the service
- B. Prevention of abuse and unauthorized access
- C. Identifying and resolving system errors and technical issues

ii. Necessity test

- A. The collection of logged data is necessary for the above purposes.
- B. The data is minimized and purpose-limited.

iii. Balancing the rights and interests of data subjects

- A. The data itself does not contain sensitive information, so it does not disproportionately infringe on the privacy of data subjects.
- B. Access to the data is restricted, and its retention period is regulated.
- C. Data processing is proportionate and justified for the purposes of service security, preventing abuse, and ensuring the stable operation of the system.

e. Conclusion: the processing of logged data is lawful, proportionate, and audit-compliant.

## 6. Data processing related to the COMPETENCE CARD

### a. Data processing required to apply for the COMPETENCE CARD

i. Personal data processed by the Data Controller:

To enable the Data Subject to take advantage of discounts related to training services, and to verify eligibility for the discount, the Data Controller processes the following Personal Data of the Data Subject:

- A. full name (last name and first name(s));
- B. if the Data Subject requests the service in their capacity as an employee, then
  - I. the name of their employer (full or abbreviated name as listed in the commercial register), tax identification number;
  - II. the Data Subject's work email address;
  - III. the data subject's work phone number.
- C. if the data subject requests the service in a non-employee capacity, then
  - I. the data subject's personal (private) email address;
  - II. the data subject's personal (private) phone number

### b. Other data processed by the Data Controller:

i. If the Data Subject avails themselves of a discount related to the COMPETENCE CARD, in addition to the information described in Section 4.a.i., the following data will also be processed:

- A. the fact that the Data Subject has used the discount;

- B. data on previous training courses forming the basis for verifying eligibility for the discount;
- C. the data specified in Section 6.a. provided by the Data Subject when applying for previous training courses.

**c. Purpose of Data Processing**

- i. The purpose of data processing is to determine eligibility for the discount associated with the COMPETENCE CARD and to provide the discounts.

**d. Legal basis for data processing**

- i. The legal basis for the processing of Personal Data is the Data Subject's explicit, voluntary, and unambiguous consent.
- ii. The Personal Data specified above are strictly necessary to determine eligibility for applying for the COMPETENCE CARD and to provide any applicable discounts; therefore, if the Data Subject withdraws their consent to data processing and, as a result, the Data Controller is no longer able to process the Data Subject's Personal Data, the use of services related to the COMPETENCE CARD will become impossible.

**e. Retention period for Personal Data**

- i. Until the Data Subject withdraws their consent, or, in the absence thereof, until the termination of the service related to the COMPETENCE CARD.

**f. Processing of data necessary for the Data Controller to comply with accounting and tax obligations**

- i. Personal data processed by the Data Controller
  - A. the fact that the Data Subject has availed themselves of the discount;
  - B. the monetary value of the discount, and
  - C. the data appearing on the invoice issued in connection therewith.

**g. Purpose of data processing**

- i. The purpose of data processing is to fulfill the tax and accounting obligations applicable to the Data Controller.

**h. Legal basis for data processing**

- i. The legal basis for data processing is the fulfillment of the Data Controller's tax and accounting obligations.

**i. Retention period for personal data**

- i. The Data Controller retains the issued invoice (including the Personal Data contained therein) as an accounting document for the period specified by the applicable provisions of the Accounting Act (for 8 years).

**7. Data Processors**

- a. The Data Controller engages data processors in the provision of the service in accordance with Article 28 of the GDPR.
  - i. SystemInSync Kft – Registered office: Termál fürdő körút 35/b, 2131, Göd, Activity: computer programming, hosting services
- b. Data processors handle personal data exclusively in accordance with the Data Controller's instructions and ensure appropriate technical and organizational measures for security.

## 8. Profiling

- a. In connection with the application for a COMPETENCE CARD, profiling or automated decision-making as defined by the GDPR does NOT take place.
- b. This means that the Data Controller does not analyze the Data Subject's Personal Data listed in this Notice in any way for the purpose of drawing further conclusions, nor does it make any automated decisions regarding the Data Subject based on this data without human intervention.

## 9. The Data Subject's rights regarding data processing

- a. The Data Subject is entitled to certain rights set forth in the GDPR regarding the processing of their Personal Data. The Data Subject may exercise these rights at any time by contacting the Data Controller via one of the contact details provided below.
- b. The Data Controller's contact information:  
Email: [info@qfdgroup.com](mailto:info@qfdgroup.com)  
Mailing address: 2330 Dunaharaszti, Sisak Street 3.
- c. The Data Controller will review the Data Subject's request and then take the necessary measures. The Data Controller will respond to the request as quickly as possible, but no later than 1 (one) month from receipt.

### d. The Data Subject's Right of Access

The right of access to Personal Data means that the Data Subject has the right to request information regarding the processing of Personal Data at any time.

The Data Subject may request that the Data Controller inform them whether their Personal Data is being processed, and if so,

- what Personal Data is being processed,
- what the purpose of the processing is,
- to which recipient(s) the Data Controller discloses the Personal Data,
- how long the Data Controller stores the Personal Data,
- what rights the Data Subject has in connection with the processing, and
- whether the Data Controller transfers the Data Subject's Personal Data to a country or organization outside the European Economic Area, and if so, what additional safeguards the Data Controller has put in place to protect the Data Subject's Personal Data.

The Data Subject may also request that the Data Controller prepare a copy of the Personal Data processed by the Data Controller and provide it to the Data Subject. The Data Controller shall provide such copies to the Data Subject in .pdf format, as an email attachment, or in another format. The Data Controller may refuse to provide a copy of the processed Personal Data if doing so would adversely affect the rights and freedoms of any third party, or if providing the copy would infringe upon any third party's trade secrets or intellectual property.

### e. Right to Rectification

The Data Subject may request the modification of the Personal Data processed by the Data Controller in the event that such data is inaccurate or has changed in the meantime.

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

The Data Subject has the right to have their Personal Data "erased." This means that if at least one of the following conditions is met, the Data Controller shall erase the Data Subject's Personal Data or the portion thereof affected by this right without undue delay:

- the Personal Data is no longer necessary for the purposes set out in Section 7 above;
- the processing was based on the Data Subject's consent, and the Data Subject has withdrawn that consent;
- despite the Data Controller's best intentions and efforts, the processing of the data was unlawful;
- the Data Controller is required to erase the Data Subject's Personal Data pursuant to the laws of the European Union or Hungary.

If possible, the Data Controller will also notify the recipient(s) of the erasure of the Personal Data. Upon separate request, the Data Controller will provide a list of the recipient(s) who have been notified of the erasure.

The Data Controller is not obligated to delete Personal Data if the processing is necessary for the

establishment, exercise, or defense of legal claims, or if the Data Controller is required to retain the data under the laws of the European Union or Hungary.

The Data Controller processes Personal Data for the purpose of applying for the COMPETENCE CARD and providing related services; therefore, exercising the right to erasure may prevent the Data Subject from being able to apply for services related to the COMPETENCE CARD.

The Data Controller expressly excludes its liability in the event that the Data Subject is unable to use the service because the Data Controller was required to erase the Data Subject's Personal Data pursuant to the right mentioned in this section.

#### **g. Right to Restriction of Processing**

The Data Subject may request the restriction of Data Processing if at least one of the following conditions is met:

- the Data Subject disputes the accuracy of the Personal Data (in this case, the restriction applies for a period that allows the Data Controller to verify the accuracy of the Personal Data;
- despite the Data Controller's best intentions, the processing was unlawful, but instead of erasure, the Data Subject requests restriction of processing;
- the Data Controller no longer needs the Personal Data for the purposes of Data Processing, but the Data Subject requires it for the establishment, exercise, or defense of legal claims;

If the Data Controller restricts data processing, it remains entitled to store the Personal Data but may not perform any other operations on them. Data processing may not be restricted if it is necessary for the Data Controller to assert, exercise, or defend its legal claims, or to protect the rights of third parties.

The Data Controller processes Personal Data for the purpose of applying for a COMPETENCE CARD and providing related services; therefore, if the Data Subject requests a restriction on Data Processing, this may render it impossible to apply for services related to the COMPETENCE CARD.

The Data Controller expressly excludes its liability in the event that the Data Subject is unable to use the service because the Data Subject has requested the restriction of the processing of their Personal Data.

#### **h. Right to data portability**

The Data Subject may request that the Data Controller provide their Personal Data to them or to another data controller designated by them in a structured, commonly used, machine-readable format (e.g., PDF, email).

#### **i. Right to lodge a complaint, right to an effective judicial remedy**

If the Data Subject believes that the Data Controller is processing their Personal Data unlawfully, they may file a complaint with the competent data protection authority. In Hungary, complaints may be filed with the National Authority for Data Protection and Freedom of Information ("NAIH").

NAIH contact information:

Website: <https://www.naih.hu/>

Address: 1055 Budapest, Falk Miksa Street 9-11.

Mailing address: 1363 Budapest, P.O. Box 9

Phone: +36 (30) 683-5969

+36 (30) 549-6838

+36 (1) 391 1400

Fax: +36 1 391 1410

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Official Portal

Short name: NAIH

KR ID: 429616918

If the Data Subject lives or works abroad (e.g., in another Member State of the European Union), the complaint may also be submitted to the competent data protection supervisory authority of the Member State where the Data Subject has their habitual residence or workplace.

In the event of a violation of rights, the Data Subject may also bring the matter before a court if

- they believe that the Data Controller is processing their Personal Data unlawfully (it is not necessary to first

conduct NAIH proceedings to assert a claim in court);

- the NAIH has issued a decision against which the Data Subject wishes to appeal;
- the NAIH fails to address the Data Subject's complaint or fails to inform the Data Subject within three months of the procedural developments or the outcome of the submitted complaint (in the latter two cases, the proceedings must be initiated against the NAIH).

The Data Subject may initiate court proceedings before the competent court of their place of residence or habitual residence (depending on the Data Subject's choice). Further information about Hungarian courts can be found at the following link: <https://birosag.hu>

For matters not covered in this Notice, the relevant laws and the provisions of the Privacy Notice available at <https://qfdgroup.com> shall apply.

Budapest, March 19, 2026

QFD Group Kft.  
Data Controller