

Privacy notice on the processing of personal data related to training delivery

What is the purpose of this notice?

The purpose of this privacy notice is to provide individuals who participate in, or are involved in the organization of, the training titled "Information Systems Security Officer (annual refresher training) / CEO (initial training) / CEO (annual refresher training)" held on ____ 2026 (hereinafter referred to as the "Training") with detailed and clear information regarding what personal data Ernst & Young Consulting Ltd. processes, for what purposes, on what legal basis and for how long in connection with the organization, delivery and documentation of the Training and related administrative activities.

Please read this privacy notice carefully. It has been prepared in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR") and the applicable Hungarian data protection legislation.

Who is the data controller?

The data controller is Ernst & Young Consulting Ltd. (registered office: 1132 Budapest, Váci út 20.; hereinafter referred to as "EY" or the "Data Controller"). The Data Controller determines the purposes and means of processing personal data related to the Training.

The Data Controller is committed to processing personal data lawfully, fairly, transparently, for specified purposes, and only to the extent necessary.

For what purposes do we process personal data?

The purpose of processing is to organize and deliver the Training, identify and communicate with participants, maintain records of participation, carry out administrative tasks related to the Training, and, where necessary, verify completion of the Training.

Processing purpose	Description
Training organization	Inviting, registering and informing participants, and ensuring that the necessary technical requirements are met.
Training delivery	Conducting the training session, managing attendance, maintaining communication, and providing Training Materials, where appropriate.
Participation verification	Documenting attendance and managing certificates, attendance sheets, or completion

	records if required by the nature of the Training.
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What is the legal basis for processing personal data?

The primary legal basis for processing is the freely given, specific, informed, and unambiguous consent of the data subjects participating in the Training. Data subjects may withdraw their consent at any time; however, withdrawal does not affect the lawfulness of processing carried out before withdrawal. In certain cases, processing may also be based on legal obligations (including reporting obligations under Act LXXVII of 2013 on Adult Training, data requests from the police or other authorized authorities) or on the legitimate interests of the Data Controller.

What personal data do we process and for how long?

Data processed in connection with the Training

The Data Controller may process, in particular, the following personal data in connection with the organization and delivery of the Training: name, employer or organization name, job title, email address, telephone number, participation status, attendance information, communications related to the Training, and data necessary to verify completion of the Training.

In the case of online training, the communication or training platform used may also process technical data, such as login credentials, IP addresses, connection times, images, or voice recordings if participants use a camera or microphone, or if the Training is recorded based on a separate notice.

For adult education reporting purposes, the Data Controller may process and transfer to the reporting system operated by the National Office of Vocational Education and Adult Training (the "Reporting System") all personal data necessary to comply with statutory reporting obligations related to the Training, including data required for participant identification, communication, and verification of attendance. This may include the categories of personal data specified in Section 15 (1) of Act LXXVII of 2013 on Adult Training, in particular the Training participants' personal identification data, email address and highest level of educational attainment.

How long do we retain your personal data?

The Data Controller will process personal data only for as long as necessary for the purposes of organizing, delivering and documenting the Training. Where retention is required to verify participation, evidence contractual performance, or establish, exercise or defend legal claims, personal data may be retained for the applicable statutory limitation period and/or for any longer period required under applicable law or contractual retention requirements.

Who may access your personal data?

Your personal data may be accessed only by employees, contractors, or collaborators of the Data Controller who require access for the purposes of organizing, delivering or documenting the Training, or for reporting data to the Reporting System and performing related administrative tasks. The Data Controller may also engage data processors, such as IT, training administration, or communication service providers. Where required by law, personal data may be transferred to the Reporting System. Other than as described above, personal data will be disclosed to third parties only where required by law, necessary for the performance of a contract, based on the data subject's consent or on the Data Controller's legitimate interest.

How do we ensure the security of your personal data?

The Data Controller implements appropriate technical and organizational measures to protect personal data against unauthorized access, alteration, transfer, disclosure, deletion, damage, or destruction.

The Data Controller restricts access to personal data, treats such data as confidential, and ensures that all persons involved in the processing of personal data are subject to appropriate confidentiality and data protection obligations. Where personal data is transferred within the EY network, EY implements appropriate data protection safeguards, including through its Binding Corporate Rules (BCRs). Further information about the EY BCR program is available at https://www.ey.com/en_gl/legal-and-privacy/data-protection-binding-corporate-rules-program.

What should you do if you have questions or concerns regarding data processing?

You have the right to request information about whether the Data Controller processes your personal data and, if so, to access that data and related information. Requests may be submitted to Ernst & Young Consulting Ltd. using the Data Controller's official contact channels.

You also have the right to request correction of inaccurate personal data, completion of incomplete data, and, where the conditions set out in the GDPR are met, deletion of personal data or restriction of processing.

As processing is based on consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal. However, please be aware that withdrawal does not affect processing or transfers that the Data Controller is legally required to perform, including statutory reporting to the Adult Education Reporting System.

If you believe that the processing of your personal data violates applicable data protection laws, you may file a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (1055 Budapest, Falk Miksa utca 9-11, Hungary; telephone: +36 1 391 1400; email: ugyfelszolgalat@naih.hu; website: www.naih.hu), or initiate court proceedings.

The Data Controller will respond to requests without undue delay and, in any event, no later than one month after receipt of the request. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months.

Final provisions

This notice contains general information regarding the processing of personal data in connection with the delivery of the Training. Where a particular Training involves data processing activities that differ from or are additional to those described in this notice, the Data Controller will provide separate information regarding such processing.