

**PRIVACY NOTICE
FOR CONTACT INITIATED BY THE DATA SUBJECT**

Last updated: April 4, 2020.

1. PURPOSE OF THE NOTICE

The purpose of this notice (hereinafter: “**Notice**”) is to present how **NEW WAY NWYE Management Kft. – New Way Young Entrepreneurs Center** (registered seat: H-1054 Budapest, Alkotmány utca 20. IV/22.; website: www.nwye.hu; hereinafter: “**NEW WAY**” or “**Controller**”) processes personal data provided by you and how NEW WAY ensures the safety of such personal data when you contact us through the “Contact us” function available on our website or via an email sent to any of our email addresses or by regular mail or in any other way.

2. WHAT IS PERSONAL DATA?

a) Personal data

Any and all information that refers to an identified or identifiable natural person (i.e., a human being – or “data subject” as used by the law) shall be considered personal data. A natural person is identifiable if that person can unambiguously be identified directly, or indirectly, i.e., especially on the basis of an identifier such as a name, number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, intellectual, economic, cultural or social identity of that natural person.

b) Special categories of personal data

According to the GDPR, special categories of personal data are personal data revealing the racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, furthermore genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

3. WHAT SHALL I DO IF I PROVIDE SOMEBODY ELSE'S PERSONAL DATA IN MY MESSAGE?

If you contact us in a matter not related to the services provided by NEW WAY and you (also) provide us with personal data referring to another person, it shall be your obligation and responsibility to make sure that such personal data are disclosed to us lawfully. If applicable, we advise you to acquire the related express and documented consent of the persons concerned and to provide them with this notice prior to sending us their personal data.

4. LEGAL BACKGROUND OF DATA PROCESSING

As controller, NEW WAY is committed to being fully compliant with the provisions of the prevailing national and European laws and regulations – especially the General Data Protection Regulation No. (EU) 2016/679 (hereinafter: “**GDPR**”) when processing the data of its clients, partners and other natural persons it comes into contact with.

Therefore, NEW WAY will take every reasonable measure to ensure the safety of the personal data provided by you at the highest level possible and will within such scope take every necessary technical and organizational measure and develop the required procedural rules to protect the personal data processed by NEW WAY from unauthorized access, disclosure, unauthorized alteration and deletion.

5. WHAT IS THE PURPOSE OF DATA PROCESSING PERFORMED BY NEW WAY?

NEW WAY processes the personal data provided by you upon contacting us for the following purpose:

- a) To reply to your question, comment, observation or other query (whether it is related to the services provided by us or pertain to another issue).

6. LEGAL GROUNDS OF DATA PROCESSING

a) Data processing on the basis of your consent

If you contact us in a matter not related to the services provided by NEW WAY or if you contact us in a matter related to the services provided by us but not with the intention of becoming our client, the legal basis of data processing is your consent to the processing, in accordance with Article 6(1) a) of the GDPR. You give your consent to the data processing (by implication) upon contacting us via any of NEW WAY's contact details.

If any personal data falling into a special category of data are included in your query, the legal basis of the processing of such personal data is your explicit consent to the processing, in accordance with Article 9(2) a) of the GDPR.

Your consent is given freely (you decide if you want to contact us or not) and can be withdrawn at any time. However, we hereby inform you that the withdrawal of your consent to data processing does not affect the lawfulness of the data processing performed by us prior to the withdrawal.

If you withdraw your consent after contacting us, NEW WAY will not be able to reply to your queries any longer.

b) Data processing in preparation of a contract to be concluded with you

If you contact us in a matter related to the services provided by NEW WAY, the data processing will be based on the steps taken at your request prior to entering into a contract with us, according to Article 6(1) b) of the GDPR.

If any personal data falling into a special category of data are included in your query, the legal basis of the processing of such personal data is your explicit consent to the processing, in accordance with Article 9(2) a) of the GDPR

In addition to any consent given by you to data processing, we hereby inform you that in some cases – depending on the content of your message –, data processing may also be necessary on the basis of Article 6(1) c) for compliance with a legal obligation to which NEW WAY as controller is subject or for the purposes of legitimate interests pursued by NEW WAY or by a third party, according to Article 6(1) f) of the GDPR.

7. WHAT KIND OF PERSONAL DATA ARE PROCESSED BY NEW WAY?

In order to achieve the purpose specified in Section 5 of this Notice, NEW WAY processes the following personal data provided by you:

a) your email address (if you contacted us electronically); b) your name (if you provided it); c) the question, observation or other comment included in your query; d) all additional personal data you provided in your query, for example phone number.

8. HOW LONG ARE THE PERSONAL DATA PROVIDED BY ME PROCESSED?

a) In case of contact in a matter not related to the services provided by NEW WAY

We will process the personal data specified in Section 7 of this Notice only until it is necessary to reply to the question, comment or other query included in your message.

We hereby inform you that – in accordance with the last paragraph of Section 6 – NEW WAY may possibly process the personal data included in your message even after replying to your query if, for example processing is necessary for compliance with a legal obligation to which NEW WAY is subject or for the purposes of the legitimate interests pursued by NEW WAY or by a third party.

b) In case of contact in a matter related to the services provided by NEW WAY

If you and NEW WAY enter into contract as a result of contracting negotiations between us, we will retain the personal data specified in Section 7 of this Notice for five (5) years following the termination of the contract concluded.

If you and NEW WAY do not conclude a separate contract related to your query or if you contacted us in a matter related to our services but not with the intention of becoming a client, the personal data provided by you will be retained for five (5) years following the reply to your query.

9. DATA PROCESSORS USED BY NEW WAY

In the course of data processing in accordance with this Notice, NEW WAY engages the following data processors to perform certain data processing activities:

Name of data processor	Data processing activity performed by the data processor
Seal-Comp Kereskedelmi és Szolgáltató Kft. (székhely: 2330 Dunaharaszti Gárdonyi Géza utca 6.)	Operating the IT systems of NEW WAY.
X-KONTÍR Kft. (székhely: 1119 Budapest, Csurgói út 22-32/A. II/26.)	Accounting services for NEW WAY.
Bálint Brigitta EV. (székhely: 1042 Budapest, Kassai utca 60.)	Marketing services for NEW WAY.

NEW WAY reserves the right to change or extend the above list of data processors, if necessary; however, you can request NEW WAY any time to provide you with information on the name and contact details of the data processors it engages. NEW

WAY undertakes to ensure that the data processors it engages fully comply with NEW WAY's instructions and with the applicable laws and statutory provisions pertaining either to data protection or other issues within the scope of carrying out their data processing activities.

10. ARE PERSONAL DATA TRANSFERRED TO A THIRD COUNTRY?

As a general rule, the personal data provided by you to NEW WAY will not be transferred to a country outside of the European Economic Area (hereinafter: "EEA"). If, however, due to any rare and important reason it becomes necessary to transfer any personal data on an ad hoc basis to a country outside of the EEA, NEW WAY undertakes to perform any such transfer exclusively in compliance with an adequacy decision in accordance with the GDPR, sufficient guarantees or if a special condition stipulated in Article 49(1) of the GDPR is fulfilled.

11. WHO HAS ACCESS TO THE PERSONAL DATA PROVIDED BY ME?

The personal data provided by you are exclusively accessible (in addition to the data processor we use in the given field) to NEW WAY members and employees who are involved in replying to your query.

12. WHAT RIGHTS DO I HAVE IN CONNECTION WITH THE PROCESSING OF MY PERSONAL DATA?

According to the applicable Hungarian and EU data protection regulations, you have the right to

- receive confirmation / feedback of whether or not your personal data are being processed, and if they are, you are entitled to request access to your personal data. Within such scope you can receive the following **information**: the purposes of processing, the categories of personal data concerned, the recipients or categories of recipients to whom personal data have been or will be disclosed, the duration of data processing, the source of the personal data processed and your right to lodge a complaint with a supervisory authority (see the detailed description of such right in [Article 15 of the GDPR](#));
- request the **rectification** of your inaccurate personal data or have your incomplete personal data **completed** (see the detailed description of such right in [Article 16 of the GDPR](#));
- request the **erasure** of your personal data in cases specified by the GDPR (e.g., if you have withdrawn consent on which the processing is based or your personal data are no longer necessary in relation to the purposes of data processing) (see the detailed description of such right in [Article 17 of the GDPR](#));
- request the **restriction of the processing** of your personal data in cases specified by the GDPR. You can request the restriction of your personal data if you contest the accuracy of your personal data processed by NEW WAY, or you object to the processing of your personal data or if NEW WAY processes your personal data unlawfully and you request the restriction of processing instead of the erasure of your data. You are also entitled to exercise this right if NEW WAY no longer needs your personal data for the purposes of the processing, but you require them for the establishment, exercise or defense of legal claims. If you have requested the restriction of the processing of your personal data in the above way, the data concerned can only be further processed (beyond their storage) within the narrow scope specified by the GDPR (e.g., if the personal data affected by the restriction are required to exercise legal claims) (see the detailed description of such right in [Article 18 of the GDPR](#));
- exercise your **right to data portability** by requesting NEW WAY as Controller to provide you with your personal data in a structured, commonly used and machine-readable format or to transmit such data to another controller. You have the right to data portability if the processing is based on your consent or on the performance of a contract which you are a party to, and – in both cases – if the processing is carried out by automated means (for example within the scope of a computer system) (see the detailed description of such right in [Article 20 of the GDPR](#)).

13. RIGHT TO OBJECT

In addition to the rights specified in the previous Section, pursuant to [Article 21 of the GDPR](#), you have the right to **object** to the processing of your personal data, in cases specified by the GDPR (e.g., if processing is based on the lawful interest of NEW WAY). If you exercise this right, NEW WAY shall no longer process your personal data unless NEW WAY demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

14. HOW CAN I EXERCISE MY RIGHTS AND HOW CAN I CONTACT NEW WAY IF I HAVE QUESTIONS

REGARDING DATA PROCESSING?

If you want to exercise your above rights or you have any questions or comments regarding this Notice or the data processing performed by us, please contact us via any of the below contact details:

Contact details of NEW WAY as controller:

Name: NEW WAY NWYE Management Kft. – New Way Youth Enrichment Center
Address: H-1054 Budapest, Alkotmány utca 20. IV/22.
Email: office@nwye.hu
Telephone: +36/705212222

NEW WAY strives to reply to your queries or perform your requests concerning privacy as soon as possible, but not later than one (1) month following the receipt of your message. Please note, however, that – if necessary due to the complexity and/or number of your requests – NEW WAY may, on the basis of the GDPR, extend the above deadline by two (2) additional months. We shall inform you about any eventual extension of the deadline within one (1) month following the receipt of your request.

If we find your request not to be grounded and, consequently, NEW WAY cannot perform your request, we shall send you a related notification (also including the details of our refusal) within one (1) month following the receipt of your request.

Please also note that we can only perform your requests related to the processing of your personal data by us following the verification of your identity, without which (e.g., via the telephone) we can provide general information only.

15. WHAT LEGAL REMEDIES DO I HAVE?

If you believe NEW WAY (or its data processors) violated your rights in the course of the data processing it carried out, you have the following options:

- contact NEW WAY directly via the contact details specified in the previous Section;
- lodge a complaint with any of the supervisory authorities (e.g., in Hungary with the Hungarian National Authority for Data Protection and Freedom of Information, hereinafter "NAIH"). Contact details of NAIH: registered seat: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c.; Telephone: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu;
- initiate an action before court if you believe that NEW WAY or one of its data processors processed your personal data unlawfully. In this case you are entitled to initiate the action – apart from applying the general rules on competence – before the county court having jurisdiction over your home address or place of residence. See the competences and contact details of the courts on the following website: www.birosag.hu.

In any case we advise you to contact us first with your privacy related concerns, complaints or observations, and we will do our best to comply with such.

16. PRIVACY NOTICE UPDATES

We may amend this privacy Notice (primarily in order to comply with any amended statutory requirements) in the future. The amendments of the privacy Notice shall enter into force when the updated version of the Notice is published on our website. The date of the last update of the privacy Notice is indicated at the top of the document.
