

## **Data Protection Policy**

The Company respects the individual rights of the Users, and the Company shall process the personal data on the basis of this Policy. The Company declares that the decisions on the purposes and means of processing are taken in Hungary in which case the legal regulations of Hungary are applicable, the Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as: 'Act'), the Regulation (EU) 2016/679 of the European Parliament and 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 (hereinafter referred to as: 'GDPR'), furthermore with the recommendation of the National Authority for Data Protection and Freedom of Information (hereinafter referred to as: 'Authority').

### **Data Controller Details**

Name: **Best Concept Ltd.**

Registered Office: 43/2 Zrínyi Street, 9081 Győrújbarát, Hungary

Tax ID: 22665346-2-08

Company Registration Number: 08 09 019844

Email Address: giczikocsis.noemi@bestconcept.hu

Company Representative: Tünde Cecília Komlósi

Contact Person: Noémi Giczi-Kocsis

### **Our Privacy Policy includes the following:**

- / Types of identifying data collected by us;
- / Scope of data controllers;
- / List of data processing purposes;
- / Legal bases for these processing activities;
- / List of recipients to whom the data will be disclosed;
- / How the data is stored;
- / Conditions for data deletion.

Please read our Data Protection Policy carefully to understand how we handle your personal data.

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## Data Protection Policy

As data controllers, we declare that the processing of personal data is carried out lawfully, fairly, and in a transparent manner for the data subject.

As data controllers, the personal data collected by us may only be processed for specified, explicit, and legitimate purposes, and they shall not be processed in a manner incompatible with these purposes; furthermore, their storage shall be in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

In accordance with our data security policy, we ensure that unauthorized persons cannot access personal data, and that the storage and placement of personal data are arranged in a way that prevents unauthorized access, disclosure, alteration, or destruction.

As data controllers, we reserve the right to modify this statement in accordance with legal requirements or our data processing activities. If the modifications affect the use of personal data provided by the data subject, we will inform the user of the changes via email. If the modification of the statement leads to changes in the details of the data processing, the data controller will request the consent of the data subject separately.

## Key Terms

The conceptual framework of this policy corresponds to the definitions provided in Article 4 of the General Data Protection Regulation (GDPR), supplemented in certain points by the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as 'Act'). Accordingly:

- **Personal data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Biometric data:** personal data resulting from specific technical processing relating to the physical, physiological, or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy data.
- **Profiling:** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural

person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

- **Consent:** any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **Data controller:** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- **Data processing:** any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Data processor:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Third party:** a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

### **Legality of Data Processing**

As data controllers, we declare that our data processing principles are in line with the current data protection regulations, including but not limited to:

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as 'Act', data protection law)
- Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as 'GDPR')
- Act V of 2013 - Civil Code
- Act C of 2000 on Accounting
- Act LXXVII of 2013 on Adult Education

## Data Controller Activities

The main activity of the company is business management, other management consulting, and organizational design and development. The core focus of its activities is the creation and development of HR strategies, which includes shaping human resource management processes, practices, and policies, providing consultancy and workshops, as well as mapping the entire organizational operation when necessary.

From a data protection perspective, key tasks include conducting organizational diagnostics, situation analyses, and providing recommendations, as well as measuring and evaluating leadership competence – with the involvement of additional data processors where applicable.

## Data Processing Activities

### Data processing related to organizational design and development

<b>Purpose of data processing:</b>	<ul style="list-style-type: none"><li>• Recording, storing, and maintaining the data of participants in organizational development, workshops: to fulfil the contract with the client.</li><li>• Recording, storing, and maintaining the data of the client contact person in relation to the contracting and performance: preparation of contract with the client, communication during contract execution, invoicing.</li><li>• Recording, storing, and maintaining the data of the client contact person for compliance with accounting and tax document retention obligations: fulfilling accounting and tax document retention obligations.</li><li>• Contacting participants in organizational development, workshops after the completion: retrospectively assessing the effectiveness of the organizational development, workshop, or session and using the findings for service improvement.</li></ul>
<b>Legal basis for data processing:</b>	<ul style="list-style-type: none"><li>• GDPR Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;</li><li>• GDPR Article 6(1)(a) for recording, storing, and maintaining the data of participants in organizational development, workshops.</li></ul>

	<ul style="list-style-type: none"> <li>• GDPR Article 6(1)(f) for recording, storing, and maintaining the data of the client contact person in relation to contracting and performance.</li> <li>• GDPR Article 6(1)(c) for recording, storing, and maintaining the data of the client contact person for compliance with accounting and tax document retention obligations.</li> <li>• GDPR Article 6(1)(a) for contacting participants in organizational development, workshops after the completion.</li> </ul>
<b>Data Subjects:</b>	<ul style="list-style-type: none"> <li>• Participants in organizational development, workshops.</li> <li>• Client contact person in relation to contracting and performance.</li> <li>• Client contact person for compliance with accounting and tax document retention obligations.</li> <li>• Participants in organizational development, workshops after completion.</li> </ul>
<b>Processed Data:</b>	<ul style="list-style-type: none"> <li>• Participants in organizational development, workshops: name, email address, position, optionally results of applied surveys/ psychometric tests/ assessments, optionally results of the Assessment Center, organizational chart, optionally process flows, optionally data related to salary policy (base salary, bonus, other benefits), optionally performance indicators, optionally summarized results in report format.</li> <li>• Client contact person in relation to contracting and performance: name, email address, phone number.</li> <li>• Client contact person for compliance with accounting and tax document retention obligations: name, email address, phone number.</li> <li>• Participants in organizational development, workshops after completion: name, email address.</li> </ul>
<b>Data Source:</b>	<ul style="list-style-type: none"> <li>• Participants in organizational development, workshops: participant or client.</li> <li>• Client contact person in relation to contracting and performance: client.</li> <li>• Client contact person for compliance with accounting and tax document retention obligations: client.</li> </ul>

	<ul style="list-style-type: none"> <li>• Contacting participants in organizational development, workshops after completion: participant.</li> </ul>
<b>Data Retention Period:</b>	<ul style="list-style-type: none"> <li>• Participants in organizational development, workshops: until expiration of demands arising from the contract with the client.</li> <li>• Client contact person in relation to contracting and performance: until expiration of demands arising from the contract with the client.</li> <li>• Client contact person for compliance with accounting and tax document retention obligations: <ul style="list-style-type: none"> <li>a. Accounting retention period: 8 years from the termination of the contract.</li> <li>b. Tax retention period: until expiration of the right to determine tax, in the case of deferred tax until 5 years after the last day of the calendar year of the deferred tax's maturity. <ul style="list-style-type: none"> <li>• Contacting participants in organizational development, workshops after completion: for 3 years from participation.</li> <li>• If surveys are used: for 3 years from completing the test.</li> </ul> </li> </ul> </li> </ul>
<b>Data Transfer:</b>	Third party providing surveys/psychometric tests/assessments.
<b>Data Storage Location:</b>	Saved on laptop and/or in paper format.
<b>Authorized Access:</b>	According to terms specified in the commissioning contract.

## Coaching Activity Related Data Processing

<b>Purpose of Data Processing:</b>	<ul style="list-style-type: none"> <li>• Recording, storing, and maintaining the data of coaching participants: to fulfil the commissioning contract.</li> <li>• Recording, storing, and maintaining the data of the client contact person in relation to contracting and performance: preparation of contract with the client, communication during contract execution, invoicing.</li> <li>• Recording, storing, and maintaining the data of the client contact person for compliance with accounting and tax document retention obligations: fulfilling accounting and tax document retention obligations.</li> <li>• Contacting coaching participants after completion: retrospective assessment of coaching effectiveness and utilizing feedback for service improvement.</li> </ul>
<b>Legal Basis for Data Processing:</b>	<ul style="list-style-type: none"> <li>• GDPR Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;</li> <li>• GDPR Article 6(1)(a) for recording, storing, and maintaining the data of coaching participants.</li> <li>• GDPR Article 6(1)(f) for recording, storing, and maintaining the data of the client contact person in relation to contracting and performance.</li> <li>• GDPR Article 6(1)(c) for recording, storing, and maintaining the data of the client contact person for compliance with accounting and tax document retention obligations.</li> <li>• GDPR Article 6(1)(a) for contacting coaching participants after completion.</li> </ul>
<b>Data Subjects:</b>	<ul style="list-style-type: none"> <li>• Coaching participants.</li> <li>• Client contact person in relation to contracting and performance.</li> <li>• Client contact person for compliance with accounting and tax document retention obligations.</li> <li>• Coaching participants after completion.</li> </ul>



<b>Processed Data:</b>	<ul style="list-style-type: none"> <li>Coaching participants: name, email address, phone number, personality profile based on psychometric test/ assessment completion (e.g., ProfileXT, CheckPoint360, LSI™).</li> <li>Client contact person in relation to contracting and performance: name, email address, phone number.</li> <li>Client contact person for compliance with accounting and tax document retention obligations: name, email address, phone number.</li> <li>Contacting coaching participants after completion: name, email address.</li> </ul>
<b>Data Source:</b>	<ul style="list-style-type: none"> <li>Coaching participants: participant or client.</li> <li>Client contact person in relation to contracting and performance: client.</li> <li>Client contact person for compliance with accounting and tax document retention obligations: client.</li> <li>Contacting coaching participants after completion: participant.</li> </ul>
<b>Data Retention Period:</b>	<ul style="list-style-type: none"> <li>Coaching participants: until expiration of demands arising from the contract with the client.</li> <li>Client contact person in relation to contracting and performance: until expiration of demands arising from the contract with the client.</li> <li>Client contact person for compliance with accounting and tax document retention obligations: <ul style="list-style-type: none"> <li>a. Accounting retention period: 8 years from termination of the contract with the client.</li> <li>b. Tax retention period: until expiration of the right to determine tax, in the case of deferred tax until 5 years after the last day of the calendar year of the deferred tax's maturity. <ul style="list-style-type: none"> <li>Contacting coaching participants after completion: for 3 years from participation</li> <li>If surveys are used: for 3 years from completing the test.</li> </ul> </li> </ul> </li> </ul>
<b>Data Transfer:</b>	Third party providing surveys/ psychometric tests/ assessments.
<b>Data Storage Location:</b>	Saved on laptop and/or in paper format.
<b>Authorized Access:</b>	According to terms specified in the commissioning contract.

## Recording of Photos and Portraits Taken During Organizational Development Workshops

<b>Purpose of Data Handling:</b>	Fulfilment of commissioning contract / documenting organizational development programs (if required by grant requirements).
<b>Legal basis of Data Handling:</b>	GDPR Article 6(1)(a): The data subject has given consent to the processing of their personal data for one or more specific purposes.
<b>Data Subjects:</b>	Participants in the development program.
<b>Processed Data:</b>	Photo, portrait, audio recording.
<b>Data Source:</b>	Indirectly from the data subject.
<b>Duration of Data Handling:</b>	1 year.
<b>Data Transfer:</b>	Not applicable.
<b>Data Storage Location:</b>	Saved on a laptop.
<b>Authorized Access:</b>	Based on provisions in the commissioning contract.

## Recording, Storing, and Maintaining Contact Information of the Client Liaison in Connection with Contracting

<b>Purpose of Data Handling:</b>	Facilitating communication during contract fulfilment.
<b>Legal Basis of Data Handling:</b>	GDPR Article 6(1)(f): Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
<b>Data Subjects:</b>	Client liaison.
<b>Processed Data:</b>	Name, email address, phone number.

<b>Data Source:</b>	Client company.
<b>Duration of Data Handling:</b>	Until expiration of the contractual requirements with the client.
<b>Data Transfer:</b>	Not applicable.
<b>Data Storage Location:</b>	Saved on a laptop.
<b>Authorized Access:</b>	Based on provisions in the commissioning contract.

### Handling of Contact Information Related to Potential Clients and Partners

<b>Purpose of Data Handling:</b>	Providing information related to the Company's activities and services.
<b>Legal Basis:</b>	GDPR Article 6(1)(a): the data subject has given consent to the processing of their personal data for one or more specific purposes.
<b>Data Subjects:</b>	Individuals registering on the website <a href="http://www.bestconcept.hu">www.bestconcept.hu</a>
<b>Processed Data:</b>	Name, email address, phone number.
<b>Data Source:</b>	Indirectly from the data subject.
<b>Duration of Data Handling:</b>	1 year (for inquiries regarding service information or general inquiries about the company following the response period).
<b>Data Transfer:</b>	Not applicable.
<b>Data Storage Location:</b>	Saved on a laptop
<b>Authorized Access:</b>	Employees of the Company

### Handling of Contact Information in Fulfilment of Contractual Obligations

<b>Purpose of Data Handling:</b>	Providing access to contact information of contractual partners, ensuring availability of Partner contacts.
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<b>Legal Basis:</b>	For natural persons: GDPR Article 6(1)(b) (performance of a contract), For legal entity representatives: GDPR Article 6(1)(f) (legitimate interest of the data controller).
<b>Data Subjects:</b>	Contracted partners, liaison personnel of contracted partners.
<b>Processed Data:</b>	Name, phone number, email address, position; for representatives authorized for signing: signature.
<b>Data Source:</b>	Indirectly from the data subject, and for legal entity data subjects, from the data subject's employer.
<b>Duration of Data Handling:</b>	For the duration of the legal relationship, or after its termination, until the general civil law limitation period (5 years).
<b>Data Transfer:</b>	Not applicable.
<b>Data Storage Location:</b>	Saved on a laptop.
<b>Authorized Access:</b>	Employees of the Company.

## COOKIE Notice

On the website [www.bestconcept.hu](http://www.bestconcept.hu), we use cookies to make your visit more convenient. Information on data processing related to the use of cookies is available on the website.

## Data Transmission

Best Concept Ltd. is in contact with the following companies regarding the processing of personal data in the course of its activities:

- CX-Ray Ltd.
- Human Synergistics Hungary Ltd.
- Human Synergistics, Inc.
- Microsoft
- Profiles International Hungary Ltd.
- Profiles International, LLC
- Saville Assessment Ltd.
- Subsystems Trading Ltd.
- SurveyMonkey
- TradeAudit Ltd.

## **Information on Remedies**

The data subject may request information on the processing of their personal data, request correction of their personal data, and – except for mandatory data processing – deletion, withdrawal, exercise of data portability and objection rights, in the manner indicated at the time of data collection or using the contact details of the data controller provided above.

In case of complaints, the data subject may turn to the National Authority for Data Protection and Freedom of Information or – at their discretion – to a court in Hungary. The court has jurisdiction over the judicial proceedings.

### **1. *Right to Information***

The data controller takes appropriate measures to provide data subjects with all information regarding the processing of personal data mentioned in Articles 13 and 14 of the GDPR, as well as all information according to Articles 15–22 and 34, in a concise, transparent, understandable, and easily accessible format, clearly and in plain language.

### **2. *Right of Access***

The data subject is entitled to receive feedback from the data controller as to whether their personal data is being processed, and if such processing is underway, the data subject has the right to access their personal data and the following information:

purposes of the data processing;

categories of personal data concerned;

- recipients or categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries or international organizations;
- the envisaged period for which the personal data will be stored;
- the right to rectification, erasure, or restriction of processing and the right to object;
- the right to lodge a complaint with a supervisory authority;
- information about the source of the data;
- the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The data controller shall provide the information within one month from the submission of the request.

### **3. *Right to Rectification***

The data subject may request the correction of inaccurate personal data concerning them and the completion of incomplete data by the data controller.

#### **4. *Right to Erasure***

The data subject has the right to request the deletion of their personal data without undue delay by the data controller for one of the following reasons:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the data controller is subject;
- the personal data have been collected in relation to the offer of information society services.
- Data erasure cannot be initiated if processing is necessary:
  - for exercising the right of freedom of expression and information;
  - for compliance with a legal obligation which requires processing by Union or Member State law to which the data controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
  - for reasons of public interest in the area of public health, or for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, insofar as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
  - for the establishment, exercise, or defense of legal claims.

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

Upon request of the data subject, the data controller shall restrict processing if one of the following conditions applies:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims; or
- the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

If processing is restricted, aside from storage, personal data shall only be processed with the data subject's consent or for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State.

#### **6. *Right to Data Portability***

The data subject has the right to receive the personal data concerning them, which they have provided to the data controller, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller.

#### **7. *Right to Object***

The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or in the legitimate interests pursued by the controller or by a third party. This includes profiling based on those provisions. In case of objection, the data controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.

#### **8. *Right to Withdraw Consent***

The data subject has the right to withdraw consent at any time.

#### **9. *Right to Lodge a Complaint with a Supervisory Authority***

The data subject has the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data relating to them infringes the GDPR. The supervisory authority shall process the complaint without undue delay and may refer the matter to the court.

### **Data Security**

Best Concept Kft., as a data controller and data processor, takes all necessary measures to ensure the security of data, ensuring their adequate protection, especially against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as against accidental loss or damage. It ensures the security of the personal data it processes through appropriate technical and organizational measures.

### **Other Provisions**

In matters relating to data processing, the data subject may enforce their rights and claim compensation and damages to which they may be entitled under the law before a court. If the data subject has been unable to resolve their objections, complaints, or requests regarding the processing of their personal data satisfactorily with the data controller, or if the data subject otherwise believes that a breach of their personal data processing has occurred or there is an imminent danger thereof, they may file a

complaint or report at the National Authority for Data Protection and Freedom of Information using the following contact information:

Postal address: 1363 Budapest, Pf.: 9.

Address: 1055 Budapest, Falk Miksa utca 9-11

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

Furthermore, the data subject has the right to appeal to a court in the following cases:

- against a legally binding decision of the supervisory authority;
- if the supervisory authority does not deal with the complaint;
- if the supervisory authority does not inform the data subject about the progress or outcome of the complaint within 3 months;
- if, in the data subject's opinion, the Data Controller or the Data Processor employed by them has violated their rights under the GDPR due to improper data processing according to the provisions of the GDPR.

This Information is governed by Hungarian law, particularly by Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Info Act), and by 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).

We inform our customers those authorities such as courts, public prosecutors, investigative authorities, administrative authorities, the National Authority for Data Protection and Freedom of Information, and other bodies empowered by law may approach the data controller to provide information, disclose data, transfer data, or make documents available. In accordance with the GDPR provisions, the data controller shall only disclose personal data to the authorities to the extent necessary to achieve the purpose of the request, provided that the authority has specified the exact purpose and scope of the data.

Under the GDPR, if the Data Controller fails to take action on the data subject's request based on Articles 15-22 without undue delay, but at the latest within one month of receipt of the request, they shall inform the data subject of the reasons for the delay and of their right to lodge a complaint with a supervisory authority and to seek judicial remedy.

Effective from: August 20, 2025, until revoked.



