

# PRIVACY POLICY

**Silent Signal LCC.**

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## 1. THE PURPOSE OF THE DOCUMENT

This document is a unilateral commitment of **Silent Signal LLC.** as a data controller pursuant to Regulation (EU) 2016/679 of the European Parliament (EU) and of the Council of 27 April 2016 (hereinafter referred to as "GDPR") and the relevant legislation.

The information may be unilaterally modified and/or withdrawn by the controller at any time, with simultaneous notification to the data subjects. The information shall be provided by publication on the website or, depending on the nature of the change, by direct notification to the data subjects.

## 2. DATA CONTROLLER'S DATA

**Organization name:** Silent Signal LLC.

**Location:** 1052 Budapest, Vármegye utca 3-5.

**Represented by:** Weisz János, CIO

**E-mail:** [info@silentsignal.hu](mailto:info@silentsignal.hu)

**Phone:** +36 20 316 7983

## 3. RELATED LEGISLATION

Our data management activities are related to the following legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information
- Act LXXVII/2013 on Adult Education
- Act C of 2000 on Accounting
- Act I of 2012 on the Labour Code

## 4. PURPOSE OF PRECCESING, SCOPE OF DATA A PROCESSED

Data is processed in the course of the following activities of Silent Signal LLC.

### 4.1. Signing up for training

#### 4.1.1. Scope of data processed

- Participant name
- Participant's birth name
- Participant's place of birth
- Participant's date of birth
- Participant's place of work
- Participant's position
- Participant's e-mail address
- Participant's phone number
- Participant's mailing address
- Participant's highest level of education
- Invoicing details (see below 4.6 point)
- ISACA ID (if the participant requests CPE points)
- Coupon code (if you have a coupon entitling you to a discount)
- Source of information
- Applicant's data on food allergy or intolerance



#### 4.1.2. Purpose of data processing:

Ensuring registration for training courses organized by Silent Signal LLC, conducting training courses, contacting participants and fulfilling related legal obligations.

#### 4.1.3. Legal basis for processing:

Compliance with a legal obligation or voluntary consent of the data subject during registration.

#### 4.1.4. Duration of data processing:

Until claims under the contract are enforceable.

### 4.2. Registration for events or webinar organized by Silent Signal LLC.

#### 4.2.1. Scope of data processed

- Name of applicant
- Applicant's employer
- Position of applicant
- Applicant's e-mail address
- Applicant's telephone number
- Applicant's details of food allergies or intolerances

#### 4.2.2. Purpose of data processing

Ensuring registration for events organized by Silent Signal LLC., organizing events, contacting participants.

#### 4.2.3. Legal basis for processing:

Voluntary consent of the data subject during registration.

#### 4.2.4. Duration of data processing:

Until the end of the event.

### 4.3. Photographs and videos taken at events and training courses organized by Silent Signal LLC.

#### 4.3.1. Scope of data processed:

- Photos about participants
- Video footage of participants

#### 4.3.2. Purpose of data processing:

Promoting and publicizing events and training courses organized by Silent Signal LLC. on the organization's website and social media platforms.

#### 4.3.1. Legal basis for processing:

Legitimate interest.

#### 4.3.1. Duration of data processing:

Until the legitimate interest ceases to exist or until the data subject has effectively objected in writing.

### 4.4. Applying for a job advertisement

#### 4.4.1. Purpose of data processing:

- Name of applicant
- Applicant's e-mail address
- Applicant's telephone number
- Additional personal information provided in your CV (e.g., date of birth, photo, etc.)

#### 4.4.2. Scope of data processed:

Selection of potential candidates.



#### 4.4.1. Legal basis for processing:

Voluntary consent of the data subject.

#### 4.4.1. Duration of data processing:

Until consent is withdrawn in writing.

### 4.5. Tendering, contracting implementation of projects

#### 4.5.1. Purpose of data processing

- Name of client (organization)
- Place of establishment
- Mailing address
- Name of the contact person of the client
- Contact person's e-mail address
- Contact person's telephone number

#### 4.5.2. Scope of data processed:

Communication and sending documents related to tenders, contracts and projects.

#### 4.5.3. Legal basis for processing:

Legitimate interest.

#### 4.5.4. Duration of data processing:

Until the claims arising from the contract are enforceable.

### 4.6. Invoicing

#### 4.6.1. Purpose of data processing

- Invoicing name
- Invoicing address
- VAT number
- Invoicing e-mail address
- Name of service to be invoiced

#### 4.6.2. Scope of data processed:

Issue of an invoice.

#### 4.6.1. Legal basis for processing:

Compliance with a legal obligation.

#### 4.6.1. Duration of data processing:

At least 8 years from the date of issue.

### 4.7. Customer satisfaction survey

#### 4.7.1. Purpose of data processing

- Name of client (organization)
- Name of the contact person of the client
- Position of the contact person of the client
- Client opinion

#### 4.7.2. Scope of data processed:

Continuous improvement of the quality of services provided by Silent Signal LLC.

#### 4.7.1. Legal basis for processing:

Voluntary consent of the data subject.



#### 4.7.1. Duration of data processing:

Until consent is withdrawn in writing.

### 4.8. Subscription to the newsletter

#### 4.8.1. Purpose of data processing

- Name of person concerned
- E-mail address of person concerned

#### 4.8.2. Scope of data processed:

Distribution of Silent Signal LLC. marketing materials by e-mail, promotion of events, sending newsletters and information to stakeholders.

#### 4.8.1. Legal basis for processing:

Voluntary consent of the data subject.

#### 4.8.1. Duration of data processing:

Until consent is withdrawn in writing.

### 4.9. Product order via web interface of form

#### 4.9.1. Purpose of data processing

- Name of customer
- Customer's phone number
- Customer's e-mail address
- Invoicing details (see above 4.6)
- Method of receipt
- Delivery name
- Delivery email address
- Delivery phone number
- Name of product(s) ordered
- Number of product(s) ordered
- Coupon code (if you have a coupon entitling you to a discount)
- Source of information
- Interest in related service
- Order notes

#### 4.9.2. Scope of data processed:

Distribution of Silent Signal LLC. marketing materials by e-mail, promotion of events, sending newsletters and information to stakeholders.

#### 4.9.3. Legal basis for processing:

Compliance with a legal obligation or voluntary consent of the data subject during registration.

#### 4.9.4. Duration of data processing:

Until the claims arising from the contract are enforceable.

## 5. PROFILE CREATION

Silent Signal LLC. does not use automated decision-making or profiling.

## 6. USE OF DATA PROCESSORS

Silent Signal LLC. transfers the listed data to the following contracted partners as contracted data processors:



- Accounting partner
- Agency partners

With the exception of the data processor(s) mentioned above, Silent Signal LLC. will not disclose the data to third parties without specific authorization and consent, and the data may only be disclosed to designated employees of the data controller and the data processor(s).

## 7. INFORMATION SECURITY MEASURES RELATED TO DATA PROTECTION

In order to protect personal data, Silent Signal LLC has implemented and maintains organizational and technical measures in accordance with the requirements of ISO 27001:2013, which cover the entire lifecycle of the data concerned (creation, storage, transmission, modification, deletion).

## 8. RIGHTS OF DATA SUBJECTS

The data subject may request, in writing to Silent Signal LLC at the contact details indicated in point 2 of this document, that the controller.

- provide information on the processing of their personal data, which personal data of the data subject are processed by the controller, from what source, on what legal basis, for what purposes and for how long, and on what legal basis and to whom the data have been transmitted;
- correct or modify your data
- delete your data, unless there is a legal obligation to store the data that restricts this;
- restrict processing where there is no restrictive legal obligation to store the data; and
- object to the processing of his or her 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

(Act 21(1) GDPR).

The data subject may exercise the above rights at any time. The controller shall, no later than 30 days after the submission of the request, examine the notification and comply with or reject the requests contained therein, and inform the data subject thereof in writing.

## 9. POSSIBILITIES FOR COMPLAINTS AND LEGAL REDRESS

You can make a complaint using our central contact details set out in point 2. Any data subject is entitled to take legal action against the processing complained of and may also lodge a complaint with the Supervisory Authority, whose contact details are:

### **Nemzeti Adatvédelmi és Információszabadság Hatóság**

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