



AVALON
INTERNATIONAL SCHOOL

Data Processing Information

Effective from: January 1, 2020



DATA PROCESSING INFORMATION

This data processing information document is aimed at sharing the information regarding the processing of the personal data of the Children and their Parents or Guardians (with special regard to the goal of data processing, its legal basis and the rights of those concerned) with the persons concerned.

The Data Manager shall ensure that the processing of personal data is in compliance with the applicable statutory requirements regarding data protection at any time (including, especially, the General Data Protection Regulation (**GDPR**), Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (**Infotv**), as well as Act CXC of 2011 on National Public Education (**Nkt**). In order to guarantee the security of personal data, the Data Manager will take appropriate technical and organizational measures.

If you have any questions regarding this information document or data processing, please, feel free to contact us as specified below.

1. DATA MANAGER

Avalon International School

official seat: 3516 Miskolc, Forrás utca 1.

tax number: 26941749-2-05

OM (Hungarian Ministry of Education) identification No.: 203370

e-mail: info@ais.hu

website: <https://www.ais.hu>

hereinafter referred to as : **AIS or Data Manager**

2. THE PERSONAL DATA CONCERNED, THE GOAL OF, AND LEGAL BASIS FOR DATA PROCESSING

(A) Processing of the personal data of Parents or Guardians

PERSONAL DATA (CATEGORY)	GOAL OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING
name, address, place of residence, phone number	appropriate performance of the public task of the Data Manager (keeping a register required by law)	Note e), Section 6(1) of the GDPR– the performance of a task carried out in the public interest
mother's name, place and date of birth	conclusion of education agreement	Note b), Section 6(1) of the GDPR – the execution of a contract
e-mail address	liaising with the Parent or Guardian	Note f), Section 6(1) of the GDPR – the legitimate interests pursued by AIS

(B) Processing of the personal data of Children

PERSONAL DATA (CATEGORY)	GOAL OF DATA PROCESSING	LEGAL BASIS FOR DATA PROCESSING
name, place and date of birth, sex, nationality, address, place of residence, TAJ (social security) number, legal title of residence in Hungary and the description and number of the authorization document (in the case of non-Hungarian nationals)	performance of the public tasks of the data manager in line with the provisions set out in the Act on National Public Education (Nkt)	Note e), Section 6(1) of the GDPR– the performance of a task carried out in the public interest
name, address, place of residence, phone number of parent or legal representative	performance of the public tasks of the data manager in line with the provisions set out in the Act on National Public Education (Nkt)	Note e), Section 6(1) of the GDPR– the performance of a task carried out in the public interest
data related to admission; basic public education task at which the legal relationship is targeted; data related to the suspension or termination of legal relationship; data related to the child’s absence; data related to special needs children; data related to the child’s accident; Ministry of Education identification number; assessment identification number	performance of the public tasks of the data manager in line with the provisions set out in the Act on National Public Education (Nkt)	Note e), Section 6(1) of the GDPR– the performance of a task carried out in the public interest
data related to a student’s legal relationship (evaluation and qualification of conduct, diligence and knowledge, examination data; data related to students’ disciplinary and compensation cases; student card number; data related to textbook supply; data related to course repetition; date of termination of student’s legal relationship)	performance of the public tasks of the data manager in line with the provisions set out in the Act on National Public Education (Nkt)	Note e), Section 6(1) of the GDPR– the performance of a task carried out in the public interest
data of national assessment	performance of the public tasks of the data manager in line with the provisions set out in the Act on National Public Education (Nkt)	Note e), Section 6(1) of the GDPR– the performance of a task carried out in the public interest

cross-border education visits	performance of the public tasks of the data manager in line with the provisions set out in the Act on National Public Education (<i>Nkt</i>)	Note e), Section 6(1) of the GDPR– the performance of a task carried out in the public interest
processing of data regarding potential special diets	elaboration of a special diet	Note f), Section 6(1) of the GDPR – the legitimate interests pursued by AIS
name, serial number of chip card, time of entry/ exit, gate used	data processing as part of the access control system with a view to controlling entries and exits	Note f), Section 6(1) of the GDPR – the legitimate interests pursued by AIS
processing of medical data specified in the medical statement (diseases, medical treatments, allergies, drug intolerance, regularly administered medications, accidents, surgeries)	processing of those medical data which are necessary for the protection of the child’s life, physical integrity and health during the performance of educational activities	Note b), Section 6(1) and Note a), Section 9(2) of GDPR

3. SOURCE OF PERSONAL DATA

The source of the Children’s personal data is the Guardian (parent, legal representative) of the Child in question.

The personal data of the Guardians are made available to the Institution by the Guardians themselves.

4. ADDRESSEES OF PERSONAL DATA

The personal data of the Children may be forwarded to the following addressees in compliance with the provisions set out in Sections 41 (7)-(8) of Nkt, for the purposes defined by the law:

DATA	GOAL OF FORWARDING	ADDRESSEES
the Child’s name, place and date of birth, address, place of residence, parent’s name, legal representative’s name, address, place of residence and phone number of the child’s parent or legal representative, starting date of legal relationship, time of suspension and termination of such legal relationship, home	to identify the Child’s whereabouts, to control the legitimacy of absence from the classes or compulsory activity organized by the school on a specific school day, to establish contact with the student’s parent or legal representative, regarding the existence of a student’s legal relationship or meeting the requirements of	stakeholders, court, police, public prosecutor’s office, municipality clerk, public administrative body, national security services

schooling legal standing, number of missed classes	compulsory school attendance	
the Child's data related to admission or transfer to the school	to ensure admission to the school in question	affected school, institution
the Child's name, place and date of birth, address, place of residence, social security identification number, parent's or legal representative's name, address, place of residence and phone number of the child's parent or legal representative	school medical documentation, data related to the accident of the student or the child, with a view to establishing the health status of the child	the institution that performs health care or educational health care tasks
the Child's name, place and date of birth, address, place of residence, parent's name, legal representative's name, address, place of residence and phone number of the child's parent or legal representative, data related to the absence of the child, data related to special needs children and students	to identify and terminate the Child's vulnerable position	the institution or organization involved in family protection, the organization or institution involved in child and youth protection
the Child's data required for assessing and certifying his or her entitlement to benefits	to claim the available state benefits	stakeholders
the Child's data necessary for making out an invoice	textbook supply	textbook distributor
data of the school report issued on the basis of the state examination passed by the Child	to register school reports	the organization registering school reports
data related to the Child's conduct, diligence and knowledge	to organize and hold assessments, controls and training programs	the parent, the examination board, the organizer of practical training, the subjects of the students' agreement, or if evaluation takes place outside the school, to the school, in the case of transferring to a new school, to the new school, to the person performing the professional control

all the data of the Child required for issuing a student card	to issue student cards	to the data manager of KIR, i.e. the Public Education Information Management System, to those involved in preparing the student cards
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5. DATA FORWARDING TO A THIRD COUNTRY

The Data Manager obtains the electronic school diary used for capturing the data related to the education of the Children, as well as the interface for liaising with the Parents or Guardians from a company registered in a third country, this is why some personal data are forwarded to a third country, namely India. The appropriate protection level required by GDPR, however, is guaranteed by the Data Manager by adopting the general data protection criteria stipulated by the European Commission (2010/87/EU).

6. TERM OF RETENTION

The personal data of the Parents or Guardians are retained by the Data Manager until the termination of the legal relationship between the Child and the Institution, then these will be deleted without delay.

The personal data of the Children are retained for 10 years from the termination of the Child's legal relationship with the Institution in compliance with the provisions set out in Section 41 (10) of Nkt, then these will be deleted without delay.

The medical data of the Children are retained by the Data Manager until consent is withdrawn, or until the termination of the legal relationship between the Child and the Institution the latest.

7. RIGHTS OF THOSE CONCERNED

- (a) The Guardians and the Children (***Those Concerned***) are entitled **to have access to the data processed about them**, and also, to request further information from us. We forward the personal data concerned by such requests to Those Concerned electronically.
- (b) Those Concerned are entitled to request the **correction** or supplementation of their inaccurate personal data.
- (c) Those Concerned are entitled to request the **deletion** of their personal data, as long as the statutory conditions thereof exist.
- (d) Those Concerned are entitled **to limit data processing**. In such a case, we do not process (not including data storage) their data any longer (during the period of limitation), except if Those Concerned still give their consent, or if this is necessary for making, enforcing or protecting legal claims.
- (e) Furthermore, those Concerned are entitled **to protest against data processing**. In such a case, we do not process their personal data any longer, except if we prove that such data processing is justified by such coercive reasons which have priority over the interests, rights and freedoms of Those Concerned, or which are related to making, enforcing or protecting legal claims.
- (f) Those Concerned are also entitled **to receive** the personal data that they have made available to a data manager in a well-structured, widely used, typed and legible format, or to forward these to another data manager.

8. COMPLAINTS

As long as Those Concerned think that we did not act properly in the course of processing their personal data, we ask them to get in touch with us by using the above contact details in order to settle the case amicably and as soon as possible.

However, those Concerned are also entitled to file a complaint with a supervisory authority, especially in the state of their habitual residence, workplace or the state where the violation of the law has presumably happened, if they think that our managing their personal data violates the law.

The contact details of the Hungarian supervisory authority, i.e. the **Hungarian National Authority for Data Protection and Freedom of Information (NAIH)** are as follows:

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
E-mail: ugyfelszolgalat@naih.hu
Phone: +36 1 391 1400
Homepage: www.naih.hu