

LIKEDRIVE.HU

PREMIUM **AUTÓSISKOLA**

Privacy Policy for LikeDrive Driving School Students

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1. Data Controller Information

- Name (brand name): LikeDrive Autósiskola (LikeDrive Driving School)
- Headquarters: 1174 Budapest, Berzsényi Dániel utca 59.
- Website: www.likedrive.hu (hereinafter referred to as "Website")
- Email: likedrive@likedrive.hu
- Phone number: +36 70 4343180
- Company name: Bulya Sándor egyéni vállalkozó (sole trader)
- Company form: egyéni vállalkozás (sole proprietorship)
- Registration number: 9075101
- Accreditation registration number: B/2020/005199
- (hereinafter referred to as "Driving School" or "training body")
- Name of the school director: Bulya Sándor
- School director's email: likedrive@likedrive.hu
- School director's phone number: +36 30 311 1532 (hereinafter referred to as "Data Controller")

2. Applicable Laws

- the Regulation (EU) 2016/679 of the European Parliament and of the Council 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, hereinafter "GDPR");
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information;
- the Decree No. 24/2005 (IV. 21.) GKM of the Ministry of Economy and Transport on the detailed rules of training and examination of road vehicle drivers and road transport professionals (hereinafter "GKM Decree");
- the Act LXXVII of 2013 on Adult Education;
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities;
- Act V of 2013 on the Civil Code.

3. Purpose of Data Processing, Scope of Personal Data Processed, Legal Basis, and Duration of Data Processing

3.1. Contacting Before Application

- In order to apply, you can contact the Data Controller in the following ways:
- You can visit the Data Controller's office directly,
- by phone,
- by email,
- or by filling out the "Apply Now!" form on the website.

Except for personal visits—where the contract can be concluded immediately—the Data Controller will record your name, email address, and phone number for the purpose of contacting you based on your inquiry, and will reach out to you at these contact points to discuss any questions you may have regarding the training, and to schedule an appointment for concluding the contract. The Data Controller will also send you the Terms of Service, the applicant's privacy notice, and the application form via email.

If you decide not to apply for the Data Controller's training, the Data Controller will delete your personal data related to the contact after being informed of your decision, but in any case, no later than 30 days from your first contact—assuming you have no intention to apply.

Purpose of data processing: to contact individuals interested in the Data Controller's training.

Scope of data subjects: individuals interested in the Data Controller's training, who contact the Data Controller

Processed personal data: name (first and last name), email address, phone number.

Legal basis for data processing: necessity to take steps at the request of the data subject prior to entering into a contract [GDPR Article 6 (1) point (b)]

Duration of data processing: until the purpose of data processing is fulfilled (contract conclusion) or, in the event of failure to conclude a contract, until the notification of the data subject, but no later than 30 days from the first contact by the data subject

Data Processor:

- Name: ZeroTime Services Ltd.
- Headquarters: 2013 Pomáz, Mikszáth Kálmán Street 36/4.
- Company Registration Number: 13-09-147733
- Represented by: József Hábit, Managing Director
- Website: <https://www.zerotimeservices.com/>
- Email: info@zerotimeservices.com
- Nature of data processing: providing IT and technical background as a server service provider
- Data transfer: none.
- The Data Controller does not disclose the personal data it processes to the public.
- Data storage: On the Data Controller's server (Server location: 1132 Budapest, Victor Hugo Street 18-22, and 1138 Budapest, Váci Road 188.)

3.2. Provision of training and administration of exams (performance of the contract concluded with the Data Controller and fulfillment of the Data Controller's legal obligations in this regard)

3.2.1. Course application

You can apply for the Data Controller's courses only in person, after reviewing the Data Controller's Terms of Service and Student Information document, by filling out and signing an application form. You have the option to fill out and sign the application form in advance and send it back via email to the Data Controller, but the original copy of the application form must still be submitted in person at the Data Controller's office. A completion guides for filling out the application form is also available, which can be viewed posted in the Data Controller's customer service area.

- Data processing purpose: collecting and managing data necessary for providing training by the Data Controller
- Data subjects: participants in the Data Controller's training
- Processed personal data: name (last and first name), birth name, place of birth (including district for Budapest births), date of birth (year, month, day), mother's birth name, permanent address, contact address, phone number, email address, ID number, issue date and validity, driver's license number, issue date, validity, categories, legal representative's name, permanent address, contact address, phone number, email address
- Legal basis for data processing: the necessity of processing for the performance of a contract to which the data subject is party [GDPR Article 6 (1) b)]
- Duration of data processing: 5 years from enrollment
- Data Processor:
- Name: ZeroTime Services Ltd.
- Headquarters: 2013 Pomáz, Mikszáth Kálmán Street 36/4.
- Company registration number: 13-09-147733
- Represented by: József Hábit, Managing Director
- Website: <https://www.zerotimeservices.com/>
- Email: info@zerotimeservices.com

- Nature of data processing: providing IT and technical background as a server service provider

The Data Controller acts in accordance with the applicable laws during the processing of personal data, based on its internal regulations that prescribe the detailed procedure of data processing. Detailed information is available according to the General Terms and Conditions of E-Educatio Information Technology Plc. for ordering e-learning courses, including the limited use of the e-Titán System, an accredited closed system training management system by the traffic authority: The school principal – and the persons registered by them in the e-Titán System – are authorized to order the e-learning training from the Service Provider exclusively for students in a training relationship with them. Upon completion of the official training, E-Educatio Information Technology Plc. issues an electronic certificate of completion under the conditions defined in the General Terms and Conditions, which can be downloaded and/or sent to the school principal and the student. In the absence of a contract, E-Educatio Information Technology Plc. deletes the data provided by the school principal for the purpose of concluding the contract. E-Educatio Information Technology Plc. is entitled to store the data provided by the school principal – including the data of the students registered by the school principal – in the e-Titán System. During the use of the e-Titán System and the completion of the e-learning training, the System logs the IP addresses of the student. After registering in the e-Titán System, the student's individual authentication and login attempts – including the IP address of the student's computer – are recorded by the System each time. The e-Titán System also immutably logs the student's progress in the current e-learning training, the time spent in the System, assesses, and records the student's answers and results to the control questions in the e-learning material. At the start of the official training, the System automatically forwards data defined in the 24/2005. (IV.21.) GKM Decree on the detailed rules for the training and examination of road vehicle drivers and road traffic professionals to the traffic authority via a message. At the end of the student's official training – simultaneously with the issuance of the training certificate – the System stores the student's data and descriptive data of the training in a standard XML format and data content specified by the traffic authority, with at least enhanced security electronic signature and timestamp as per the law on electronic signatures. The Service Provider retains this file for at least 5 years. After the completion of the training, the Service Provider transmits this file to the traffic authority within the time specified in the GKM Decree, in the manner specified by the traffic authority. E-Educatio Information Technology Plc. is obliged to directly notify students via e-Titán system messages or email about planned maintenance of the e-Titán System and evaluations of completed training.

3.3. Your Data Privacy Rights

3.3.1. The right to request information (access)

You can request information about the following through the contact details provided in section 1.1:

- Which personal data of yours the Data Controller processes, on what legal basis, for what purpose, from what source, and for how long.
- To whom, when based on what legislation, the Data Controller has provided access to your personal data, or to whom it has been transferred.

The Data Controller will fulfill your request without undue delay, by sending a letter to the contact details you provided.

3.3.2. The right to rectification

You can request the Data Controller to correct your personal data through the contact details provided in section 1.1, as well as through the interfaces provided within the e-Titán System, and you can also independently modify your provided email address. The Data Controller will fulfill your request without undue delay and will notify you by sending a letter to the contact details you provided or at the place of the announcement.

3.4. Data security measures

The actual data processing takes place within the e-Titán System. The Data Controller ensures that your personal data is protected against unauthorized access or unauthorized alteration, among other things. For example, access is purpose-bound, the range of people entitled to access is limited and precisely recorded, and the Data Controller acts in accordance with its internal regulations, which prescribe the detailed procedure of data processing, in compliance with the applicable laws.

Detailed information is available according to the General Terms and Conditions of E-Educatio Information Technology Plc. for ordering e-learning courses, including the limited use of the e-Titán System, an accredited closed system training management system by the traffic authority:

The school principal – and the persons registered by them in the e-Titán System – are authorized to order the e-learning training from the Service Provider exclusively for students in a training relationship with them.

Upon completion of the official training, E-Educatio Information Technology Plc. issues an electronic certificate of completion under the conditions defined in the General Terms and Conditions, which can be downloaded and/or sent to the school principal and the student.

In the absence of a contract, E-Educatio Information Technology Plc. deletes the data provided by the school principal for the purpose of concluding the contract.

E-Educatio Information Technology Plc. is entitled to store the data provided by the school principal – including the data of the students registered by the school principal – in the e-Titán System.

During the use of the e-Titán System and the completion of the e-learning training, the System logs the IP addresses of the student.

After registering in the e-Titán System, the student's individual authentication and login attempts – including the IP address of the student's computer – are recorded by the System each time.

The e-Titán System also immutably logs the student's progress in the current e-learning training, the time spent in the System, assesses and records the student's answers and results to the control questions in the e-learning material.

At the start of the official training, the System automatically forwards data defined in the 24/2005. (IV.21.) GKM Decree on the detailed rules for the training and examination of road vehicle drivers and road traffic professionals to the traffic authority via a message.

At the end of the student's official training – simultaneously with the issuance of the training certificate – the System stores the student's data and descriptive data of the training in a standard XML format and data content specified by the traffic authority, with at least enhanced security electronic signature and timestamp as per the law on electronic signatures. The Service Provider retains this file for at least 5 years. After the completion of the training, the Service Provider transmits this file to the traffic authority within the time specified in the GKM Decree, in the manner specified by the traffic authority.

E-Educatio Information Technology Plc. is obliged to directly notify students via e-Titán system messages or email about planned maintenance of the e-Titán System and evaluations of completed training.

3.5. Driving Record

According to the relevant legal provisions, the Data Controller prepares a driving record for you. The driving record is the document that entitles you to participate in practical driving lessons.

- Purpose of data processing: lawful participation in practical driving lessons
- Affected individuals: students participating in practical driving lessons.
- Processed personal data: name (first and last name), date of birth, address, e-Titán identification code, examination registration number received from the traffic authority.
- Legal basis for data processing: the necessity to fulfill the legal obligation imposed on the Data Controller [Article 6(1)(c) of the GDPR; Annex 8, point 1.3. of the GKM Decree]
- Duration of data processing: five years in case of a successful practical exam, two years from the date of an unsuccessful practical exam.
- Data Controller: The student's instructor
- The Data Controller will inform you separately about the person of the instructor in each case.
- Nature of data processing: storing and maintaining the driving record between its receipt from the Data Controller and its return to the Data Controller
- Data transfer:
- The Data Controller transfers the driving record to the traffic authority after the successful theoretical examination and at the same time informs the traffic authority which instructor is teaching which student. The traffic authority will add the examination registration number to the driving record and will authenticate it if the student has met the prerequisites for participation in practical training.
- After authentication, the Data Controller transfers the driving record to the subcontracted instructor with whom the Data Controller has a contract.

- Recipient of data transfer:
 - **Name:** Építési és Közlekedési Minisztérium Közúti Gépjármű-közlekedési Hatósági Főosztály
 - **Headquarters:** 1138 Budapest, Váci út 188. D épület fsz.
 - **Phone number:** 06-1-477-1551
 - **Email:** kepzes-kghf@ekm.gov.hu
 - Transferred data: name (first and last name), date of birth, address, e-Titán identification code.
 - Legal basis for data transfer: the necessity to fulfill the legal obligation imposed on the Data Controller [Article 6(1)(c) of the GDPR; Annex 8, point 1.3. of the GKM Decree]
 - The driving record is then handed over by the Data Controller to your instructor, as designated above, who is obliged to return it to the Data Controller after a successful practical exam. The examiner also reviews the driving record before the exam.

Recipient of data transfer:

- the examiner in charge of the student's practical exam
 - Transferred data: name (first and last name), date of birth, address, e-Titán identification code, examination registration number received from the traffic authority.
 - Legal basis for data transfer: the necessity to fulfill the legal obligation imposed on the Data Controller [Article 6(1)(c) of the GDPR; Annex 8, point 1.3. of the GKM Decree]
 - The Data Controller does not disclose the personal data it processes to the public.
 - Data storage: at the Data Controller's headquarters and the instructor's headquarters.

3.6. Displaying Opinions Written on the Data Controller's Facebook Page on the Website

The Data Controller has a Facebook page (<https://hu-hu.facebook.com/likedrive.hu/>). Just as you might be used to with other Facebook pages, you have the opportunity to leave a review here. Regarding these reviews, the data controller is Bulya Sándor ev. You can find information about Facebook's data processing in Facebook's privacy policy (<https://huhu.facebook.com/privacy/explanation>).

By entering into the contract, you consent to the Data Controller displaying your review written on the Facebook page on the Website as well, using a Facebook comment display plugin.

- Purpose of data processing: Displaying reviews written on the Data Controller's Facebook page on the Website
- Scope of data subjects: Natural persons writing reviews on the Data Controller's Facebook page
- Processed personal data: name (first and last name), any other personal data possibly provided in the review.
- Legal basis for data processing: consent of the data subject [GDPR Article 6(1)(a)]
- Duration of data processing: until the consent of the data subject is withdrawn.
- Withdrawal of consent does not entail any adverse legal consequences for the data subject.

- Data Controller:
 - Name: Bulya Sándor egyéni vállalkozó
 - Headquarters: 1174 Budapest, Berzsenyi Dániel Street 59.
 - Data transfer: none
 - The Data Controller does not disclose the personal data it manages to the public.
 - Data storage: Facebook

4. Your Rights

The Data Controller makes every effort to ensure that your rights regarding the processing of your personal data, detailed below, are respected.

The Data Controller allows you to submit your request concerning the exercise of your data subject rights by mail, email, or phone.

The Data Controller will fulfill your request without undue delay, but no later than one month from receipt of the request and will inform you in a concise, transparent, understandable, and easily accessible form. In case of refusal, the Data Controller will also decide within this timeframe and inform you of the reasons for refusal and your related legal remedies.

The Data Controller will fulfill your request primarily by email. However, if you explicitly request it by providing your postal or phone contact details, the Data Controller will fulfill the request by mail or phone. Phone information can only be given if you have verified your identity.

The Data Controller will not charge a fee or reimbursement for fulfilling your request. However, if you submit a new request for the same data set within one year of the previously fulfilled request, the Data Controller reserves the right to establish a cost proportional to the workload involved in fulfilling the request.

4.1. Right to Information and Access:

Upon request, the Data Controller will provide you with concise, transparent, understandable, and easily accessible information about the following:

- Whether your personal data is being processed by the Data Controller;
- The name and contact details of the Data Controller;
- Information about data processing, including the name and contact details of the data processor;
- Details about the personal data that the Data Controller manages and their sources;
- The purpose and legal basis of data processing;
- The duration of data processing;
- The recipients or categories of recipients to whom the personal data has been or will be disclosed, including particularly recipients in third countries or international organizations;
- The consequences of data processing;
- Your rights;
- The circumstances, impacts, and measures taken in case of a data protection incident.

The Data Controller will also inform you via email, even without your request, about significant changes to data processing compared to the information provided in this notice, as well as the circumstances, impacts, and measures taken in case of a data protection incident.

4.2. Right to Rectification:

Upon request, the Data Controller will correct inaccurate personal data concerning you. The Data Controller will inform every recipient with whom the personal data has been shared about the rectification, except when this proves impossible or involves disproportionate effort. Upon your request, the Data Controller will inform you about these recipients.

4.3. Right to Erasure:

Upon request, the Data Controller will delete personal data concerning you if one of the following cases applies:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- You withdraw your consent;
- You provided your consent before reaching the age of 16;
- You object to the data processing;
- The personal data has been unlawfully processed;
- The personal data must be erased to comply with a legal obligation under European Union or Hungarian law that applies to the Data Controller.

The Data Controller will inform every recipient with whom the personal data has been shared about the erasure, except when this proves impossible or involves disproportionate effort. Upon your request, the Data Controller will inform you about these recipients.

4.4. Right to Restriction of Processing

Upon your request, the Data Controller will restrict the processing of your personal data if one of the following applies:

- You contest the accuracy of the personal data – in this case, the restriction applies for a period enabling the Data Controller to verify the accuracy of the personal data; the processing is unlawful, but you oppose the erasure of the data and request the restriction of their use instead;
- The Data Controller no longer needs the personal data for the purposes of processing, but you require the data for the establishment, exercise, or defense of legal claims.

The Data Controller will inform every recipient with whom the personal data has been shared about the restriction, except when this proves impossible or involves disproportionate effort. Upon your request, the Data Controller will inform you about these recipients.

4.5. Right to Data Portability:

Upon your request, the Data Controller will provide you with the personal data you have provided to the Data Controller. The Data Controller also undertakes that you may transfer these personal data to another data controller without the Data Controller hindering this process.

4.6. Right to Legal Remedy

If you believe that the Data Controller has violated your right to personal data protection during the data processing, you may seek legal remedy from the relevant authorities according to the applicable laws. This means you can file a complaint with the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; website: www.naih.hu; “NAIH”), or bring the matter to the competent court.

The Data Controller undertakes to fully cooperate with either the relevant court or the NAIH during such proceedings, providing all necessary information regarding data processing.

The Data Controller also commits to compensating you for any damage caused by the unlawful processing of your personal data or breaches of data security requirements. In case of a violation of your personality rights, you may claim compensation for non-material damage. The Data Controller is exempt from liability if the damage is caused by an unforeseeable event beyond the scope of data processing, or if the damage results from the intentional or grossly negligent conduct of the data subject.

5. Miscellaneous Provisions

The Data Controller undertakes to ensure that all data processing activities related to its operations comply with the expectations set forth in this notice and the applicable laws.

The Data Controller reserves the right to amend this notice at any time, provided that any changes will be communicated to you via email as soon as possible following their implementation.

Modified: Budapest, 2025.02.13.