

AKROPOLEISZ STÚDIÓ
Data management policy

1. DATA MANAGER DETAILS

Data manager name: **Arial Arts Move Korlátolt Felelősségű Társaság** (short name: Arial Arts Move Kft.)
 Location, mailing address: 1123 Budapest, Alkotás utca 29.
 Company registration number: 01-09-996746
 Representative and responsible person for data management: Andrea Koehlerné Szántai
 Phone number: +36 30 546 9232
 E-mail address: studio@akropoleisz.hu
 Website: www.akropoleisz.hu

2. SCOPE OF MANAGED DATA, PURPOSE OF MANAGEMENT, LEGAL BASIS AND STORAGE PERIOD

The Data Manager shall manage the personal data while using the services of the pole and aerial dance studio (hereinafter referred to as the Studio) operated by the data controller. For the purpose of processing personal data, natural person who uses the services of the studio shall be affected.

Categories of personal data	Purpose of data management	Legal basis of data management	Storage period	Comment
Name (First and last name)	<ul style="list-style-type: none"> - Identification of the person using the services of the Studio. - Use the online schedule available through the Studio's website 	Contribution of the concerned person (GDPR 6. article (1) paragraph. a) point)	Your consent is until withdrawal, but not later than 24 months from the last entry into the online profile on the site.	<ul style="list-style-type: none"> - Required during registration - In case of failure to provide data, the Affected person shall not be entitled to use the services of the Studio. - Data are recorded on paper or/ electronically.
Phone number	Contact the affected person, notification in case of urgent cases (ex. changes of the schedule)	Contribution of the concerned person (GDPR 6. article (1) paragraph. a) point)	Your consent is until withdrawal, but no later than 24 months from the last entry into the online profile on the site.	<ul style="list-style-type: none"> - Required during registration - In case of failure to provide data, the Affected person shall not be entitled to use the services of the Studio. - Data are recorded on paper or/ electronically.

Categories of personal data	Purpose of data management	Legal basis of data management	Storage period	Comment
E-mail adress	Contact the affected person, notification in case of urgent cases (ex. changes of the schedule)	Contribution of the concerned person (GDPR 6. article (1) paragraph. a) point)	Your consent is until withdrawal, but no later than 24 months from the last entry into the online profile on the site.	<ul style="list-style-type: none"> - Required during registration - In case of failure to provide data, the Affected person shall not be entitled to use the services of the Studio. - Data are recorded on paper or/ electronically.
Gender	Data management is done for the purpose of schedule organization.	Contribution of the concerned person (GDPR 6. article (1) paragraph. a) point)	Your consent is until withdrawal, but no later than 24 months from the last entry into the online profile on the site.	<ul style="list-style-type: none"> - Required during registration - In case of failure to provide data, the Affected person shall not be entitled to use the services of the Studio. - Data are recorded on paper or/ electronically.
User name, password	Create own profile on the Studio's website to use the online schedule for bookings.	Contribution of the concerned person (GDPR 6. article (1) paragraph. a) point)	Your consent is until withdrawal, but no later than 24 months from the last entry into the online profile on the site.	<ul style="list-style-type: none"> - Required during registration - In case of failure to provide data, the Affected person will not be able to create or use his or her own profile. - Is possible to use the services of the Studio in other ways, can book in person or by phone.
E-mail adress	Send newsletters , information letters.	Contribution of the concerned person (GDPR 6. article (1) paragraph. a) point)	Your consent is until withdrawal, but no later than 24 months from the last entry into the online profile on the site.	<ul style="list-style-type: none"> - The newsletter is sent with an additional consent of the Affected person. The newsletter is sent quarterly, weekly based on the latest news from the Studio. - Data are recorded on paper or/ electronically.

Categories of personal data	Purpose of data management	Legal basis of data management	Storage period	Comment
<p>Classes visited by the Affected person</p>	<p>Booking data generated during the use of the online schedule will be stored for half a year</p>	<p>Contribution of the concerned person (GDPR 6. article (1) paragraph. a point)</p>	<p>Data related to class booking or visit are stored for up to half a year. The Data Manager will delete these data on the 1st of January and 1st of July of the current year.</p>	<p>Data are recorded electronically.</p>
<p>Information about the health condition of the Affected person (sports injuries, regular medication, back and posture problems)</p>	<p>For the first time, the Affected person completes a statement providing important information about his or her medical condition for using the Studio's services. This information is indispensable for the Data Manager to be able to assess what kind of service can be recommended to the Affected person. The purpose of data management is to provide appropriate advice on the offered classes and trainings.</p>	<p>Contribution of the concerned person (GDPR 6. article (1) paragraph. a point) and 9. article (2) paragraph a) point</p>	<p>Your consent is until withdrawal, but no later than 24 months from the last entry into the online profile on the site.</p>	<ul style="list-style-type: none"> - Required during registration - In case of failure to provide data, the Affected person shall not be entitled to use the services of the Studio. - Data are recorded on paper.
<p>Personal details of the legal representative (parental authority) of the person using the services of the Studio</p>	<p>The Data Manager manages the personal data of natural persons under the age of 16 with the consent of their legal representative (parental authority).</p>	<p>Contribution of the concerned person (legal representative) (GDPR 6. article (1) paragraph. a point)</p>	<p>Your consent is until withdrawal, but no later than 24 months from the last entry into the online profile on the site.</p>	

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Capture camera images	In the Studio, cameras were installed at the gym area and at the reception (customer area). The cameras would only record images, not sound. The purpose of the data is to protect the property of the Studio, to keep tracking of the classes and quality management.	Contribution of the concerned person (GDPR 6. article (1) paragraph. a) point) Legitimate interest of Data Manager (GDPR 6. article (1) paragraph f) point)	3 days after shooting.	When installing the cameras, the Data Manager paid particular attention to ensure that surveillance would not violate human dignity.
Image recording	The purpose of the picture taking is to show the classes and to raise the awareness of the Studio.	Contribution of the concerned person (legal representative) (GDPR 6. article (1) paragraph. a) point)	Your consent is until withdrawal.	The Studio takes photos of the classes. Prior to taking the pictures, the Affected person shall be informed of the photo shooting and the Data Manager shall request the Affected person's consent (verbally or in writing) to the taking or use of the pictures.

3. DATA ACCESS

The Data Manager does not use a data processor in its data management activities, nor does it transfer personal data to a third country or international organization or another recipient. During the data management, there is no automated decision or profile making. Personal data may be accessed by the Data Manager's representative and the authorized person to do so.

4. DATA SECURITY MEASURES

The Data Manager should store the data in a password protected and /or encrypted database in accordance with IT security and other standards to guarantee the confidentiality, integrity and availability of the personal data of the Affected person. The Data Controller shall provide the data in a manner proportionate to risk protection and/or protect at the network, infrastructural and on application level in line with the classification of personal and business data.

The Data Manager continuously monitors and manages privacy incidents. If the Affected person is aware of a privacy incident, can report it to the Data Manager via their contact details.

RIGHTS OF THE AFFECTED PERSON

The Affected person may request from the Data Manager access, rectification, erasure or restriction of the processing of personal data concerning him or her, object to the processing of such personal data and exercise his or her right to data portability.

The Affected person may submit his / her data management requests through the contact details of the Data Manager indicated in this informative or he/she may exercise the validation of the rights for Affected persons on the website (eg access, rectification).

Access: The Affected person has the right to access his or her personal data. The purpose of this is to make the Affected person aware and to verify that the Data Manager uses his / her personal data in accordance with the applicable data protection laws. By signing in the online profile on the website, the Affected person can access to the personal data entered.

Right of rectification: The Affected person has right to modify any inaccurate or incomplete personal data. As a registered user of the website, the Affected person may update and modify his / her personal data during the data management period through the system. In addition, he/she may request in writing, through the contact details provided by the Data Manager, that the Data Manager rectify any personal information (eg, name, e-mail address, telephone number, if any changes occur).

Right of deletion ("the right to forget"): The Data subject has the right to delete or remove his or her personal data if there is no legitimate reason for the Data Controller to re-use it. (This is not an unrestricted right, there is some exceptions.) The Affected person may at any time during the time of data processing delete his or her data from the system or request the deletion of his or her personal data in writing via the given contact details of the Data Controller.

Right to restrict data management: The Affected person may request the "blocking" or restriction of further processing of his or her data. If the data management is restricted, Data Manager may continue to store the data, but otherwise may not use it.

Restrictions on data may be requested if the Affected person:

- believe his/her data is inaccurate, or
- believe that his/her data was unlawfully processed by Data Manager, but hi/she does not wish to delete it
- requires data management to assert or protect his/her legal claim, but the Data Manager no longer needs this data.

Right to data portability: The Affected person has the right to receive his or her personal data and re-use it for his or her own purposes in connection with other services or in the management of companies. The right to data portability does not extend to paper-based data, and the Affected person may not request the transmission of data stored in this way. The data portability does not automatically delete the data, nor does it affect the retention (storage) period of the transferred data to the Data Manager.

Protest data management: The Affected person has the right to object at any time to the processing of his or her personal data for reasons related to his or her situation. In this case, the Affected person may not further process the personal data unless the Data Manager demonstrates that the data processing is justified by compelling legitimate reasons, which take precedence over the Affected person's interests, rights and freedoms, or which are necessary to assert, justify or defend legal claims related to.

Conditions for practice of the rights: The Data Manager shall, without undue delay, but in any case, within one month from the receipt of the request, inform the Affected person of the action taken in response to the request for the rights listed above. Where necessary, considering the complexity and the number of the requests, the time limit may be extended by a further two months. The Data Manager shall inform the Affected person about the extension of the deadline, indicating the reasons for the delay, within one month from the receipt of the request. If the Data Manager does not act upon the Affected person's request, it shall inform his/her without delay, but no later than one month from the receipt of the request, of the reasons for the non-action and that the Affected person can submit a complaint to the supervisory authority.

Right to submit a complaint to the supervisory authority and to go to court: The Affected person may submit a complaint to the National Data Protection and Freedom Authority regarding data management. (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c, tel.: 06 1 391 1400, e-mail: ugyfelszolgalat@naih.hu).

The Affected person's ability to assert his/her rights is subject to legal action. The Affected person may initiate a civil action against the Data Manager in case of unlawful data processing. The trial court is competent to decide the case. The lawsuit may be instituted, at the option of the Affected person, in the court of the place where he/she resides (see the list and contact details of the courts through the link below: <http://birosag.hu/torvenyszekek>).

The Affected person may request compensation from the Data Manager who is responsible for the damage in connection with unlawful data processing (including failure to comply with data security measures). If the Data Manager violates the Affected person's privacy by unlawful processing of his/her data or by violation of the data security requirements, the Affected person may claim grievance fee from the Data Controller. The Data Manager should not be responsible if proofs that the damage or violation of the privacy of the Affected person was caused by an unavoidable cause outside the scope of the data management. There is no need to compensate for the damage or to claim grievance fee if it was the result of intentional or grossly negligent behavior on the part of the aggrieved party.

Budapest, 2019. 01. 25.