

## DATA PROTECTION POLICY

in which we inform you, as our customer, about the data protection and data processing policy of Luca Douglas e.v. and Rhys Douglas e.v. This policy explains how and why we process – collect, record, organise, store and use – personal data about our customers (our pupils and their parents). Under EU data protection laws, individuals have the right to the information detailed below.

### 1. Who are we?

Going Native is a name and concept, however, Luca Douglas e.v. and Rhys Douglas e.v. are two self-employed individuals who work together to bring this concept to life. They share the same values and follow the same rules when it comes to Data Protection. Hereby, they declare that Luca Douglas e.v. and Rhys Douglas e.v., hereafter known as Going Native, will both follow the rules outlined below in their Data Protection Policy.

<b>Name</b>	Douglas Luca e.v.	Douglas Rhys e.v.
<b>Registered address</b>	8831, Nagykanizsa Mátyás király utca 19.	8831, Nagykanizsa Mátyás király utca 19.
<b>Tax number</b>	69526552-1-40	69243965-1-40
<b>Phone number</b>	+36 30 934 0322	+36 30 592 3810
<b>Contact</b>	phone, e-mail, Facebook Messenger or via post	phone, e-mail, Facebook Messenger or via post

<b>Going Native</b>	
<b>Website</b>	<a href="http://www.goingnative-bp.com">www.goingnative-bp.com</a>
<b>Facebook page</b>	<a href="http://www.facebook/goingnative.com">www.facebook/goingnative.com</a>
<b>e-mail address</b>	<a href="mailto:goingnative.bp@gmail.com">goingnative.bp@gmail.com</a>

In accordance with Article 37 of GDPR, neither Douglas Luca e.v., nor Douglas Rhys e.v. is required to appoint a Data protection Officer. From this it follows that Going Native has no obligation to do so either.

### 2. Our principles when we collect and process your personal data

- a. we process your personal data in a lawful and honest manner, in a way that is clear and understandable to you.
- b. we collect your personal details only for certain defined, obvious and lawful purposes and we do not process them in ways incompatible with the end goals.
- c. the personal data collected and processed by Going Native is reasonable and relevant for the purpose of data processing, as well as limited to the necessary data.

- d. Going Native does everything reasonably in their power to process and maintain only accurate and if necessary up-to-date data. Inaccurate personal data is deleted or modified at the earliest possible time.
- e. by using the appropriate technical and organisational methods, we ensure that your personal data is suitably protected against unauthorized or unlawful processing, accidental loss, destruction or damage.

### **When collecting and processing your personal data**

- a. we process – collect, record, organise, store and use – your personal data after giving you prior notice, requesting your consent, only to the necessary extent and always with specific end goals.
- b. in some cases, we must comply with compulsory Laws and Regulations when processing your data, in such cases we always inform you.
- c. in some cases, Going Native may have a rightful interest in processing your personal data, for example in order to run, develop and secure our website.

### **3. What personal data do we collect and process?**

#### **a. Personal data we collect and process – about our pupils**

The categories of information that we collect, process and share (when appropriate) includes, but is not restricted to:

- i. personal information – such as names, address, date of birth, health insurance number, information on relatives/next of kin and contact details.
- ii. attendance information – the number of sessions attended or missed, reasons for absence.
- iii. assessment information – such as reports, tests, examination results and feedback.
- iv. relevant medical information – such as medical conditions, allergies, medication needed and recent accidents.
- v. photographs, audio materials and videos.

We may also hold other data about our pupils that we receive from other schools or organisations.

#### **b. Personal data we collect and process – about our pupils' parents/ legal guardians**

The categories of information that we collect, process and share (when appropriate) includes, but is not restricted to:

- i. personal information – such as names, address, date of birth, health insurance number, information on relatives/next of kin and contact details.
- ii. relevant medical information – such as medical conditions, allergies, medication needed and recent accidents.

- iii. financial information relating to the payment of fees.

We may also hold other data about our pupils' parents/legal guardians that we receive from other schools or organisations.

### c. Website

**Comments** - when visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection.

An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After approval of your comment, your profile picture (if applicable) is visible to the public in the context of your comment.

**Media** - if you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

**Contact forms** - when visitors fill out the contact form (Contact) on the site we collect the data shown in the form. This data is sent to our email address (section 1) where we will respond to your message.

**Online appointment booking** – when visitors wish to book an appointment through our website, they will be redirected to <https://www.appointy.com/> (Appointy) where the booking will be completed. Visitors will be required to create an account with Appointy using their full name, email address and their country location. This information is not stored by Going Native but will be used when accessing the booking. Visitors will also be required to create a password. The Appointy privacy statement is available here: <https://www.appointy.com/privacypolicy/> .

**Cookies** – accepting the cookie banner when you first launch Going Native's site means you consent to the collection of cookies. Clicking accept creates a cookie which stops the banner from popping up after every click. This cookie expires after the time period that you choose.

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

**Analytics** – Going Native’s site uses Google Analytics to gain a better understanding of their website traffic. Google Analytics will create first party cookies to measure interactions on the site. Your IP address will be collected and shortened by Google within Member States of the European Union or other states in agreement with the European Economic Area. In addition, you may prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>. This browser add-on informs Google Analytics via JavaScript that no data and information about website visits may be transmitted to Google Analytics. Google’s privacy policy can be found here <https://policies.google.com/privacy?hl=en#products>.

**d. Who processes your personal data?**

Your personal data will be processed – collected, recorded, organised, stored and used – by Going Native in accordance with our principles detailed in Point 2.

During the processing of the data of those affected according to points 3. a. and b., Going Native (the Data Controller) will employ a Data Processor. A Data Processor is such a legal person, who processes data in the name of the Data Controller (Going Native). Data processing is a technical process related to data management. Going Native processes the personal data provided by students’ and their legal guardians with the aid of the independent contractors Müller G. Melinda e.v. and Gál Katalin e.v. (2730 Albertirsa, Vinnyica utca 8.), who are hereby considered to be data processors.

In addition, Going Native reserves the right to involve an external expert in order to provide their professional opinion regarding our students’ progress. An external expert is considered a data processor. Currently, Going Native does not employ an external expert.

#### **4. Why do we collect and process your personal data?**

Collecting information – such as the personal data described above in point 3. – is essential for Going Native to carry out the best teaching and safeguarding practices. It is also necessary to fulfil our official functions and meet legal requirements. We use the data we collect to:

- a. support student learning,
- b. monitor and report on student progress,
- c. provide appropriate pastoral care,
- d. protect student welfare,
- e. assess the quality of our services,
- f. process admissions and applications,
- g. carry out research,
- h. comply with the law regarding data sharing,
- i. keep children safe.

#### **5. How do we collect information?**

We collect pupil's information before they join us in class via registration forms or contractual agreements. These can be sent electronically (or scanned) via email, post, or handed to us in person.

The pupil's data is essential for our functions. The majority of the pupil information we collect is mandatory, some is requested on a voluntary basis. We will inform you about what information you must provide and what is optional. We will also tell you what you need to do if you do not want to share this information with us.

#### **6. How do we store information?**

We keep personal data about the pupils whilst they are attending our classes. We may also keep it beyond their attendance with us, if necessary, to comply with legal obligations. We may also keep the data for research purposes, but never longer than necessary.

Data collected on paper is filed and stored in our locked apartment in a dedicated office space. Electronic data via email is permanently deleted from our e-mail account(s) after use. Electronic data may be stored on Going Native's computers and portable hard drive. This information may be encrypted or password protected.

If you leave a comment on our website, the comment and its metadata are retained indefinitely. This is so we can recognize and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

## **7. Who do we share information with?**

### **a. Photographs, audio and video materials**

We may share photographs of children or a single child on our social media sites and website only when explicit written permission is given. These images may remain even if your child no longer attends our classes. The photographs are used for advertisement of our services and to show prospective pupils and parents what we do. They may also be shared with you as the parent of a child who partakes in a photographed activity.

### **b. Personal information (other than photographs, audio and video materials)**

We do not share information about our pupils or parents with any third party without explicit consent unless the law requires us to. Where appropriate, we will share information with:

- i. schools,
- ii. local authorities,
- iii. the students' family and representatives
- iv. health authorities

This list is not extensive and will be updated as our business changes.

## **8. Requesting access to your personal data, your rights and legal redress**

### **a. Under GDPR, parents and pupils have the right to request access to information that we hold about them. Parents of children, or children over 12 years old, may request access to this information. You also have the right to ask Going Native to correct, modify or complete your personal information.**

Requesting one's personal data is free of charge and can be requested at any time. We provide you with the information you have requested as soon as possible, but always within 1 month of the date requested.

### **b. Depending on the lawful basis, you may also have the right to:**

- i. object to processing of personal data that is likely to cause, or is causing, damage or distress.
- ii. restrict processing. You have the right to request that Going Native restricts the processing of your personal data, under certain conditions.
- iii. object to processing of your personal data, under certain circumstances.

- iv. in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed.
- v. a right to seek redress in a court of law, as described below.
- vi. file a complaint with the supervising authorities (<https://naih.hu/panaszuegyintezes-rendje.html>).

**We ask you, that you always contact us – in order to reach an agreement, settle any issues and speed the process up – prior to seeking legal redress or contacting the supervising authority.**

- c. Supervising Authority: National Data Protection and Information Freedom Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság)
  - i. Székhely: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
  - ii. Levelezési cím: 1530 Budapest, Pf.: 5.
  - iii. Telefon: +36 (1) 391-1400
  - iv. Fax: +36 (1) 391-1410
  - v. E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
  - vi. Honlap: <https://naih.hu/>

## **9. Withdrawal of consent**

Where we are processing your personal data with your consent, you have the right to withdraw that consent at any point. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting us straight away ([goingnative.bp@gmail.com](mailto:goingnative.bp@gmail.com) or see the contact information above).

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance. We will do our best to rectify the problem. Alternatively, if you would like to discuss any of the above points further, gain a clearer understanding of what we do, or have any concerns, please also contact us.

## **10. Laws upon which our policy is based**

- a. The 2016/679 (GDPR) decree of the European Parliament and European Commission (EU) – General Data Protection Regulation of natural persons and data processing
- b. 2011. CXII. Law regarding information autonomy and freedom of information – (Info tv.)
- c. 2013. V. Law regarding Civil Code
- d. 1997. CLV. Law regarding Consumer Protection – (Fogyv tv.)
- e. 2013. CLXV. Law regarding Complaints and General Interest Announcements (Pktv.)

## **11. The right to modify and update our policy**

Going Native reserves the right to modify this Data Protection Policy, because as times change, so will our business and our privacy notice. We recommend that you revisit this information from time to time. This version was last updated on 10<sup>th</sup> September 2020.

Budapest  
2022.03.18.