

FAIR DRIVING SCHOOL
DATA MANAGEMENT AND COOKIE NOTICE

Valid from: 1 September 2026

1. THE DATA CONTROLLER

Name of the data controller: Ferenc Széder, sole proprietor – FAIR Driving School
Head office: 7811 Szalánta, Hunyadi János u. 153.
Postal address: 7811 Szalánta, Hunyadi János u. 153.
Customer reception / location: 7624 Pécs, Nagy Jenő u. 8.

Educational institution ID: 6042
Adult education registration number: B/2020/004076

Head of school: Ferenc Széder
Phone: +36 70 748 4834
E-mail: fairautosiskola@t-online.hu
Website: www.fairautosiskola.hu
Hereinafter referred to as: Data Controller.

2. LEGISLATION ON DATA PROCESSING

The Data Controller processes personal data in particular on the basis of the following legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR);
- Act CXII of 2011 on the right to informational self-determination and freedom of information (Infotv.);
- Act LXXVII of 2013 on adult education (Fktv.);
- the legislation in force at all times on the training and examination of road drivers and road transport professionals, in particular Decree 24/2005. (IV. 21.) of the Ministry of Transport;
- Act C of 2000 on accounting;
- Act V of 2013 on the Civil Code;
- and other Hungarian and European Union legislation in force regarding the given data processing.

3. PRINCIPLES OF DATA PROCESSING

The Data Controller processes personal data:

- lawfully, fairly and transparently;
- for a specified, clear and legitimate purpose;
- to the extent necessary for the purpose;
- accurately and up-to-date;
- with respect for the rights of the data subjects;
- only for the period necessary;
- with appropriate technical and organisational measures.

The Data Controller processes only personal data that is necessary for the given data processing purpose.

4. PROCESSING OF STUDENTS' PERSONAL DATA

4.1. Purpose of data processing

The purpose of data processing is in particular:

- application for training;
- conclusion and fulfillment of the training/study contract;
- organization and implementation of driver training;
- verification of the student's entitlements;
- recording of driving lessons;
- organizing exams;
- keeping records required by law;
- providing data to the KAV;
- fulfilling adult training obligations;
- invoicing and accounting;

- fulfilling legal obligations;
- protecting the legal and legitimate interests of the Data Controller.

5. PROCESSED PERSONAL DATA

In particular, the following data may be processed from the person participating in the training - based on the training and the relevant legislation:

- name;
- birth name;
- mother's name;
- place and time of birth;
- citizenship;
- residential address;
- residence or notification address;
- telephone number;
- e-mail address;
- personal identification document data;
- driving license data;
- driver's license data;
- educational qualification data;
- training data;
- exam data;
- driving hours data;
- kilometers driven;
- training and payment data;
- billing data;
- data related to exemptions;
- health fitness data required by law;
- data related to driving bans;
- data related to document withdrawal;
- data related to the obligation to undergo further training;
- data related to the certification of driving skills;
- data related to the career suitability test;
- other data required by law for training and examinations.

The Data Controller only processes the data necessary for the given case.

6. LEGAL BASES FOR DATA PROCESSING

The legal basis for data processing may be, depending on the given data processing purpose:

6.1. Performance of a contract – GDPR Article 6 (1) b)

Processing of data necessary for the conclusion and performance of a training/study contract.

6.2. Compliance with a legal obligation – GDPR Article 6 (1) c)

The Data Controller may be required by law to record, transmit and retain certain data.

This may include, in particular, data processing related to road driver training, testing, adult education, accounting and taxation.

6.3. Legitimate interest – GDPR Article 6 (1) f)

The legitimate interest of the Data Controller may include, in particular:

- the exercise and defence of legal claims;
- claims management;
- IT and data security;
- ensuring the secure operation of the service.

6.4. Consent – GDPR Article 6 (1) a)

Consent may be used to process data for which there is no other appropriate legal basis, such as certain marketing purposes or the use of photographs and videos.

Consent is voluntary and can be withdrawn at any time.

7. SPECIAL PERSONAL DATA

Data relating to health and medical fitness may be special personal data under the GDPR.

The Data Controller processes such data only in the cases and to the extent specified by law.

Data relating to medical fitness shall be processed only to the extent necessary for the training, examination and fulfilment of the relevant legal obligations.

8. MINOR STUDENTS

If the person participating in the training is a minor, the Data Controller may also process the data of the legal representative in the cases specified by law.

Such data may in particular include:

- name;
- address;
- telephone number;
- e-mail address;
- data necessary to prove the right to represent.

9. DATA TRANSFER

Personal data may be transferred in particular for the purpose of training and compliance with legal obligations:

- Transport Aptitude and Examination Centre (KAV);
- transport authority;
- other authorities;
- NAV;
- accountant;
- billing service provider;
- IT service provider;
- e-learning service provider;
- trainers;
- partners involved in training;
- organisations involved in organising examinations;
- legal representative.

The Data Controller shall only transfer the data necessary to achieve the purpose.

The Data Controller shall transfer data to an authority based on a legal obligation or upon a legitimate official request.

10. E-TITÁN E-LEARNING SYSTEM

In the case of e-learning training, the personal data necessary for the training can also be processed in the e-Titán system.

The e-learning service is provided by E-Educatio Zrt.

Data processor: E-Educatio Zrt., 1111 Budapest, Budafoki út 59.

In particular, the following data can be processed in the e-learning system:

- identification data;
- contact data;
- training data;
- login data;
- training performance data;
- data related to application for an exam.

The e-Titán system may transmit training data determined on the basis of the relevant legislation to the KAV.

11. DATA PROCESSING OF TRAINERS

In order to organize the training, the necessary data of the student may be transmitted to the trainer who has a contractual relationship with the Data Controller.

The trainer may process the student's data only to the extent necessary for the implementation of the training.

12. DATA OF INTERESTED PARTIES AND APPLICANTS

The Data Controller may process the data provided by interested persons on the website, by e-mail, by telephone or in person for the purpose of establishing contact and preparing the application for the training.

In particular, the following may be processed:

- name;
- telephone number;
- e-mail address;
- chosen training category;
- subject of interest;
- other data voluntarily provided by the data subject.

The application on the FAIR Driving School website can also be made by e-mail. The provisions of this information apply to the processing of the data provided when returning the application form.

13. E-MAIL AND TELEPHONE COMMUNICATION

The Data Controller may communicate with students and interested parties by e-mail or telephone.

The data processed in this way is processed for the purpose of establishing contact, organizing the training, fulfilling the contract and fulfilling legal obligations.

14. BILLING AND ACCOUNTING

The Data Controller processes the personal data necessary for invoicing training fees and other services.

The legal basis for data processing is primarily the fulfillment of a legal obligation.

The Data Controller retains data related to invoicing and accounting documents for the period required by accounting and tax legislation.

15. USE OF THE WEBSITE

When using the www.fairautoiskola.hu website, technical data may be automatically recorded, for example:

- IP address;
- time of visit;
- browser type;
- operating system;
- pages visited;
- technical log data.

The purpose of data processing is to ensure the safe and proper operation of the website, as well as to detect and eliminate technical errors.

16. COOKIE INFORMATION

16.1. What are cookies?

A cookie is a small data file that a website can place on the visitor's computer, phone or other internet-enabled device.

Cookies allow the website to remember certain technical information and ensure its operation.

16.2. Cookies used by FAIR Driving School

The website may primarily use technical cookies that are absolutely necessary for its operation.

These are intended in particular to:

- ensure the proper functioning of the website;
- manage the session;
- provide security functions;
- technically manage user settings.

No separate consent is required for the use of strictly necessary cookies in cases where they are necessary for the operation of the website.

16.3. Non-necessary cookies

FAIR Driving School does not use non-essential cookies without the prior consent of the visitor, for example:

- traffic/statistical analysis;
- profiling;

- targeted advertising;
- marketing;
- third-party tracking.

If such a service is used on the website in the future, the Data Controller will provide the necessary consent management solution and related information.

16.4. Cookies placed by third parties

If the website uses content or services of external service providers – such as Google, Meta/Facebook, YouTube or other service providers – the respective service provider may use its own cookies or similar technologies. Non-necessary third-party cookies may only be used with consent in accordance with applicable laws.

16.5. Managing cookies in the browser

The visitor can also control or delete cookies in his own browser.

If cookies are disabled, certain functions of the website may not work or may not work properly.

16.6. Cookie retention period

Cookies necessary for the session are usually deleted when the browser is closed.

The retention period of any persistent cookies used depends on the purpose and settings of the given cookie. The Data Controller does not retain cookies for longer than necessary.

17. PHOTOGRAPHS AND VIDEO RECORDINGS

The Data Controller shall only take and use photographs or videos on the basis of an appropriate legal basis. If consent is required for publication, the recording shall only be used on the basis of appropriate consent. Consent may be withdrawn at any time.

18. MARKETING AND DIRECT MARKETING

The Data Controller shall only process data for marketing purposes on the basis of an appropriate legal basis. In the case of electronic requests for direct marketing purposes, the relevant electronic communications and data protection rules shall apply.

The data subject may object to data processing for direct marketing purposes at any time.

In the event of an objection, the Data Controller shall no longer process personal data for direct marketing purposes.

19. AUTOMATED DECISION-MAKING

The Data Controller shall not use automated decision-making or profiling that would have legal effects on the data subject or would similarly significantly affect him/her.

20. DATA SECURITY

The Data Controller shall protect personal data using appropriate technical and organizational measures, in particular against:

- unauthorized access;
- unauthorized alteration;
- unauthorized transmission;
- loss;
- destruction;
- damage;
- unauthorized disclosure.

Access to personal data is limited to those persons who are necessary for the performance of data processing tasks.

21. DATA PROTECTION INCIDENT

A data protection incident may occur in particular if personal data is lost, destroyed, disclosed to an unauthorized person or altered without authorization.

The Data Controller shall investigate and document data protection incidents.

If there is an obligation to notify the supervisory authority under the GDPR, the Data Controller shall report the incident within the deadline specified in the law.

If the data protection incident poses a high risk to the rights and freedoms of the data subjects, the Data Controller shall also inform the data subjects in the manner specified in the law.

22. RIGHTS OF THE DATA SUBJECT

The data subject has the right to:

- request information about the processing of his/her personal data;
- request access to the personal data processed about him/her;
- request the rectification of inaccurate data;
- request the erasure of his/her personal data in the cases specified in the law;
- request the restriction of data processing;
- object to data processing;
- request data portability where the legal conditions exist;
- withdraw consent to data processing based on consent at any time.

The right to erasure does not apply if the data processing is required by law or the further processing of the data is necessary for the exercise of a legal claim.

23. DATA SUBJECT REQUESTS

The data subject may submit his/her request to the following contact details:

E-mail: fairautosiskola@t-online.hu

Postal address: Széder Ferenc – FAIR Autósiskola
7811 Szalánta, Hunyadi János u. 153.

The Data Controller shall, as a general rule, respond to the data subject's requests within one month of receipt of the request.

The deadline may be extended by a further two months if necessary under the conditions specified in the GDPR.

The Data Controller shall be entitled to verify the identity of the data subject if necessary.

24. LEGAL REMEDY

The data subject may lodge a complaint with the supervisory authority:

National Data Protection and Freedom of Information Authority (NAIH)

Registered at: 1055 Budapest, Falk Miksa utca 9–11.

Postal address: 1363 Budapest, P.O. Box 9.

E-mail: ugyfelszolgalat@naih.hu

Phone: +36 (1) 391-1400

Website: www.naih.hu

The current official contact details of the NAIH can also be found on the Authority's website.

The data subject is also entitled to apply to court in accordance with the provisions of the GDPR and Hungarian legislation.

25. DATA PROTECTION OFFICER

Based on the current activities of the Data Controller, there is no obligation to appoint a data protection officer.

If the appointment of a data protection officer becomes necessary in the future based on legislation, the Data Controller will indicate his/her name and contact details in this information.

26. DATA PROCESSORS

The Data Controller may use data processors for technical or professional support of data processing tasks.

Such may include in particular:

- e-learning service provider;
- hosting service provider;
- IT service provider;
- e-mail service provider;
- accountant;
- billing service provider;

- IT security service provider;
- other service providers performing technical or professional tasks in data processing.

The data processor may only process the data in accordance with the instructions of the Data Controller and in accordance with the applicable legislation.

27. DATA TRANSFER OUTSIDE THE EUROPEAN UNION

The Data Controller shall only transfer personal data to a country outside the European Economic Area if there is an appropriate legal basis and guarantees as defined by the GDPR.

28. DATA RETENTION PERIOD

The Data Controller shall process personal data for the necessary period of time.

The retention period for each data processing is in particular:

- Interested data: until the purpose of the contact is achieved, or in the absence of any further legal basis, for a maximum of 1 year.
- Training and contractual data: for the period prescribed by the applicable transport and adult education legislation.
- Data transmitted to KAV: in accordance with the applicable legislation.
- Accounting and billing data: for the period prescribed by the accounting and tax legislation.
- Data related to legal claims: for the time necessary to enforce or defend against the claim.
- Marketing data: until the appropriate legal basis exists, or until the consent is withdrawn.

29. AMENDMENT OF THE DATA PROCESSING NOTICE

The Data Controller is entitled to amend this notice in particular:

- change in legislation;
- change in official practice;
- introduction of a new service;
- change in data processing practice;
- use of a new data processor;
- in the event of modification of the website or IT system.

The current notice is available on the website www.fairautoiskola.hu.

30. ENTRY INTO FORCE

This Data Processing and Cookie Notice shall enter into force on 1 September 2026.

With its entry into force, the previous data management information of FAIR Driving School, which came into force on May 26, 2018, will cease to be valid.

Pécs, September 1, 2026.

Ferenc Széder (e. v.) - FAIR Driving School