Privacy policy

Welcome to ESSRG!

We respect your right to privacy. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information.

1. About Us

- In this Privacy Policy, references to "we" or "us" are to ESSRG Limited, a company incorporated in Hungary whose registered office is at Impact HUB, 1053, Ferenciek tere 2, Budapest, Hungary, who will be the controller of any personal data processed as described in this Privacy Policy.
- 1.2 If you have any questions about your personal information, please write to info@essrg.hu

2. Use of the Website and Online Courses and Content

This Privacy Policy applies only to your use of the Website and Online Courses and Content. Partner Institutions who provide the Online Courses and Content or other linking sites found on the Website may also gather information and you should consult those other parties' privacy policies as appropriate and applicable.

3. Collection of Information

• 3.1 When you access the essrg.hu website and courses.essrg.hu website (referred to as Website in the future) via any means, use the Online Courses and Content, register or post notes, assignments or other material, respond to or participate in any survey or questionnaire sent to you by us or make a purchase through the Website, we may collect, store and use certain of your personal information in line with this policy. We may also

ask you for information when you report a problem with the Website or the Online Courses and Content.

- 3.2 To register or make a purchase on the Website, we ask for your name and email address. As part of your Learner profile you may also provide your location and other information that will help other learners get to know you and help us to tailor the service to suit you. We may also ask you about your gender and educational history or qualifications in order to understand more about you (responding to these questions will always be optional, however). We will also store the results of your assessments relating to Online Courses and Content. When you make a purchase, our payment service provider, will also collect and process your credit card or other payment details. If you contact us, we may also keep a record of that correspondence.
- 3.3 We may also collect data relating to your visits to the Website that cannot identify you but records your use of our Website and Online Courses and Content including, for example, details of how long you have used the Website and the Online Courses and Content for.
- 3.4 We may also collect your computer's IP address in order to help us tailor the service to your location.
- 3.5 Finally, we may receive information about you from third parties (such as credit reference agencies) who are legally entitled to disclose that information.

4. Use of Your Information

- 4.1 By accessing the Website via any means, using the Online Courses and Content, registering or posting notes, assignments or other material, or making a purchase via the Website, you agree that your personal information may be collected, stored, used and shared by us and our partners, course and content providers, or third parties we work with, for any of the following purposes:
 - (a) to provide, maintain, protect and improve the quality of the Website and the Online Courses and Content we offer, including by conducting anonymised market research, and to protect us and our users;
 - 2. (b) to provide you with a personalised browsing experience when using the Website;
 - 3. (c) to fulfil any contractual agreements between you and us;

- 4. (d) if you have taken part in an Online Course, to send you details of our other products and services which we think may interest you, unless you opt out as described at paragraph 9.1. below.
- 5. (e) to manage your Learner account that you hold with us;
- 6. (f) to allow you to use the full range of features on or via our Website;
- 7. (g) to send you course-specific email notifications and updates about Online Courses and Content you are enrolled on;
- 8. (h) to comply with legal and regulatory requirements;
- 9. (i) to contact you occasionally in order to invite you to share your opinions and experiences of ESSRG and our online courses;
- 10. (j) to allow us and other partner institutions that provide Online Courses or Content to perform academic research.
- 4.2 We may use your email address to send you course notices and updates about our Services.

5. Storage of Information

- 5.1 All information is stored on our secure servers. When you register, we will ask you to choose a password which enables you to access the Online Courses and Content. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.
- 5.2 In addition, we (or third parties acting on our behalf) may also store or process information that we collect about you in countries outside the European Economic Area, which may have lower standards of data protection. Specifically, servers used by our Website are located in Hungary.

6. Legal Basis for Processing Your Information

- 6.1 Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.
- 6.2 However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not

overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.

- 6.3 If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).
- 6.4 Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

7. Disclosure of Your Information

- We may disclose your personal information to third parties when permitted by law including:
 - 1. (a) with your consent;
 - 2. (b) to our suppliers in order for them to help us provide our services to you, this includes:
 - universities and other partner institutions that provide Online Courses or Content;
 - our provider of customer relationship management services (which allows us, for example, to send personalised email communications to you);
 - our provider of file storage and management services if you email us directly;
 - our payment services provider (as discussed at paragraph 3.2 above) when you make a purchase to process your payment;

These suppliers' use of your personal data may be subject to their own privacy policies, which are available on their websites, and which we suggest you familiarise yourself with in the relevant circumstances set out above.

8. Data Retention

• 8.1 We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

9. Your Rights

- 9.1 You have the following data protection rights:
 - You can edit your personal details via your profile page whenever you wish.
 - In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us at info@essrg.hu
 - You may unsubscribe from certain email communications by emailing us at info@essrg.hu You may also update your personal information by logging into the Website and visiting your Learner profile page. We will answer every email as promptly as possible.
 - Similarly, if we have collected and process your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
 - If you have any privacy-related questions or unresolved problems, you may contact us using the information provided at paragraph 13 below.
 - You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.
 - The Website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies. Please check these policies before you submit any personal information to these websites.

10. Cookies

• 10.1 The Website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website or Online Courses may no longer be available to you.

11. Links to Third Party Websites

- 11.1 When clicking on a link within a course step or in a course email, you will be taken to a third-party website, the use of which has been arranged by and is the responsibility of the course providing organisation.
- 11.2 On this website you may be asked to submit some information about yourself. Please make sure you are familiar with the terms and conditions and privacy policy of the third-party website before submitting your information.
- 11.3 The course providing organisation will only use your personal information for the purpose stated in the course and in accordance with the terms of the third-party website.
- 11.4 Whether you follow a link in a course and submit your personal information or not, your course progress will in no way be affected.

12. Updating this Privacy Policy

• We may update or amend this Privacy Policy from time to time, to comply with law or to meet our changing operational requirements. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Any updates or amendments will be posted on the Website. By continuing to access the Website, using the Online Courses and Content or providing content in connection with the Online Courses and Content, your access and use will be subject to these updates and amendments.

13. Contacting ESSRG

If you have any questions, comments or complaints about this Privacy Policy, please contact us using the details below:
E-mail: info@essrg.hu

This page was last updated on 21 October 2019.