

DATA HANDLING POLICY

1. Data Handler

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This document serves as a one-sided commitment of the Data Handler in accordance with Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 and with all related national laws.

The contents of this document are subject to change or withdrawal by the Data Handler provided that the Subjects are given prior notification. Information on policy changes is made public on the website and/or—depending on the type of the change—the Subjects are notified directly.

2. The goal of data handling

2.1 Maintaining contact with partners, customers, suppliers

Identification of the user and distinguishing them from other clients and users; maintaining contact, sending system messages pertaining to the service, participation in events and related services; providing quotations; concluding agreements; recording and handling data of contact persons; maintaining personal contact; handling orders made via telephone; related documentation of contact person data reconciliation and partner visits; project handling; maintaining contact in regards to project management or participation in consortia or supplier group.

Legal basis of data handling: Legitimate interest – It is the legitimate interest of the Data Handler to register the data of contact persons in order to successfully conclude their contracts.

Scope of handled data: Name, address, email address, telephone, unique identification;

Planned deadline for data handling: last working day of March following the fourth year of the partnership contract's termination or until the Subject's objection.

2.2 Invoicing and compiling mandatory documentation needed to perform the service

Legal basis of data handling: Legal obligation;

Scope of handled data: Billing name and address, email address;

Planned deadline for data handling: 8 years minimum.

2.3 Receiving/sending orders in the organization's storage

Removal from storage, receipt of goods for legal persons, data of the recipient/sender of goods are recorded on the removal order or in the case management system. While inspecting the data, the Data Handler may decide to validate the identification of the supplier or recipient of goods via a photographic ID.

Legal basis of data handling: Legitimate interest – It is the legitimate interest of the Data Handler to register the data of contact persons and the natural person receiving the goods in order to successfully conclude the contract.

Scope of handled data: Name, photographic ID number, car registration number;

Planned deadline of data handling: last working day of March following the fourth year of the partnership contract's termination or until the Subject's objection.

2.4 Mail handling

Recording express and registered mail related to the Data Handler's business activities and mail sent to or received from other service providers.

Legal basis of data handling: Legitimate interest – It is the Data Handler’s legitimate interest to register the data of the contact persons.

Scope of handled data: Name, address.

Planned deadline of data handling: last working day of March following the fourth year of the partnership contract’s termination or until the Subject’s objection.

2.5 Managing and recording contracts

Recording contracts related to the Data Handler’s business activities; handling the contracting party’s contact data and keeping them up-to-date; recording the data of the contracting party’s authorized persons and keeping them up-to-date.

Legal basis of data handling: Legitimate interest – It is the Data Handler’s legitimate interest to register the data of the contact persons.

Scope of handled data: Name, telephone number, position in the company, email, signature;

Planned deadline of data handling: last working day of March following the fourth year of the partnership contract’s termination or until the Subject’s objection.

2.6 Handling requests for quotation (RfQ)

Registering and answering requests for quotation arriving to the organization’s central email address or that of an employee. Providing quotations.

Legal basis of data handling: Legitimate interest – It is the legitimate interest of the Data Handler to record the data of contact persons and maintaining contact before a contract is made.

Scope of handled data: Name, address, email address, telephone number, unique identifier.

Planned deadline of data handling: last working day of March following the year of the RfQ being recorded or until the Subject’s objection.

2.7 Managing and recording orders

Legal basis for data handling: Legitimate interest – It is the legitimate interest of the Data Handler to record the data of contact persons and maintaining contact before a contract is made.

Scope of handled data: Name, address, email address, telephone number, unique identification

Planned deadline of data handling: 8 years minimum.

2.8 Delivering orders

Completing deliveries for partners with the help of transportation companies.

Legal basis of data handling: Legitimate interest – It is the legitimate interest of the Data Handler to record the data of contact persons and recipients in order to successfully conclude their contracts.

Scope of handled data: Name, address, telephone number, email, signature.

Planned deadline of data handling: Until the Subject’s objection.

2.9 Logistical service on behalf of third parties

Data handling related to delivery services carried out on behalf of a contractual partner of the Data Handler.

Legal basis of data handling: Legitimate interest – It is the legitimate interest of the Data Handler to record the data of contact persons and recipients (natural persons) in order to successfully conclude their contracts

Scope of handled data: Name, address, email, telephone number, unique identifier, signature

Planned deadline of data handling: last working day of March following the fourth year after the data handling ends.

2.10 Advertising services and providing information to partners

Providing information about new or renewed services, sending direct business requests or marketing communications, customer satisfaction surveys, invitation to marketing events, eDM, telephone calls with the help of telemarketing service providers.

Legal basis for data handling: Consent.

Scope of handled data: Name, company name, email, telephone number.

Planned deadline of data handling: Until revocation.

2.11 Identification and registration of persons entering the premises

Data handling of persons not in possession of an organizational entry card. Facilitating the entry of guests and their vehicles.

Legal basis of data handling: Legitimate interest – It is the legitimate interest of the Data Handler to oversee their premises and protect the properties located on-site, to prevent accidents and to be able to carry out exhaustive actions in case of an emergency.

Scope of handled data: Name, ID card number, company name, vehicle's registration number.

Planned deadline of data handling: 1 month.

2.12 Operation of the electronic video surveillance system

In order to maintain security of the Data Handler's premises and to protect the Data Handler's on-site properties, the safety of their employees and guests and the private properties thereof; to examine the circumstances of accidents or crimes that may occur.

Legal basis of data handling: Consent.

Scope of handled data: Photograph and video recording of the natural person (henceforth: recording).

Planned deadline of data handling: 3 days.

2.13 Travel arrangements for partners

Organization of events, travel arrangements, accommodation and event participation for partners and guests of the Data Handler.

Legal basis of data handling: Consent.

Scope of handled data: Name, address, telephone number, email address, IT log files, personal ID card number, passport number.

Planned deadline of data handling: 1 year.

2.14 Data handling in relation to the GDPR

Legal basis of data handling: Legal obligation.

Scope of handled data: Name; Privacy protection identifier; Subject's request, date, type, contents thereof; results of Subject's request; date of incident, documentation and results thereof.

Planned deadline of data handling: The handled data is not to be discarded.

2.15 Registration for events

Handling registrations pertaining to company or family day events organized by the Data Handler.

Legal basis of data handling: Consent.

Scope of handled data: Name, company name, position, email address, telephone number.

The number of adult guests and minors (under 16 years of age).

Planned deadline of data handling: Until Subject revokes their consent, but for a maximum of 3 years.

2.16 Photo and video documentation of company events

The Data Handler may create photographic and video recordings of events they organize. These recordings will be stored in their organizational database and may be made public on the Data Handler's website and Facebook page.

Legal basis of data handling: Consent.

Scope of handled data: recordings of face and body.

Planned deadline of data handling: Until Subject revokes their consent.

2.17 Identification and recording of persons entering the Data Handler's premises with the use of car registration recognition system

Identification of vehicle registration number of persons entering the premises with a vehicle.

Legal basis of data handling: Legitimate interest.

Scope of handled data: Name, company name, registration number of vehicle.

Planned deadline of data handling: for renters: 6 months; for guests: 24 hours.

3. Advertizing of services, providing information to Subjects

Providing information about new or renewed services, sending direct business requests or marketing communications, customer satisfaction surveys, invitation to marketing events, conferences

Legal basis of data handling: Legitimate interest – The ability to obtain business is the legitimate interest of the Data Handler.

Scope of handled data: email, name.

By utilizing one or more of the Data Handler's services, the Subject has provided the Data Handler with the below data. The Data Handler shall inform the Subject that data handled in accordance with the activities outlined in section 2 shall be requalified and used to obtain direct business on grounds of legitimate interest.

Source of data: The Data Handler has handled the Subjects' data to complete a different goal.

Planned deadline of data handling: Until the Subject objects to this type of data handling.

4. Consequences of refusing to provide necessary data

The completion of the objective of data handling fails.

5. Scope of subjects

Partners and authorized contact persons specified by partners who are in contractual relationship with the Data Handler, as well as any natural or legal persons purchasing the organization's products or services, or the representatives thereof.

6. Scope of mandatory data

The Data Handler shall not mark mandatory data on forms on which all data must be provided. On forms on which not all requested data needs to be provided, the Data Handler shall use an asterisk (*) to denote the mandatory fields.

7. Minors

Our products and services are not intended for persons of 16 years and below. We request that persons under 16 years of age do not provide the Data Handler with their personal data. If we learn that we have collected personal data of minors, we shall make all reasonable efforts to delete their data as soon as possible.

8. Information on data processing service use

The Data Handler shall forward the collected data to their contractual data processing service providers.

Categories of recipients: courier service providers, transportation companies, IT service providers, web storage providers, web content developers, accounting service providers, Hungarian Mail.

Security services, online payment service providers.

Legal consultant, GDPR consultant, information security consultant, application developer, application manager, event sponsors, event organizers, photo and video service providers, social media pages.

9. Scope of persons entitled to access the data

The Data Handler shall not disclose the collected data to a third party excepting the data processing service providers listed in section 8. The recorded data shall only be accessed by the Data Handler's and the data processing service providers' employees assigned for this purpose.

The Data Handler shall not disclose photographic and video recordings to a third party excepting the security service provider listed in section 8. These recordings shall only be accessed by the Data Handler's and the data processing service providers' assigned employees.

The recordings made by the electronic surveillance system shall only be accessed by the Privacy Protection Manager, the IT Manager and the CEO/COO. The Subject may request to access recordings made of their own person only, and only in the presence of one of the officers mentioned above. The access must be expressly requested from the Privacy Protection Manager in writing.

The Data Handler shall compile a record of the Subject's access of their own data, which will be stored by the organization for one year.

9.1 Persons permitted to limit access to the electronic surveillance system recordings

The recordings made by the electronic surveillance system may only be limited if the Data Handler has become aware of an incident that may potentially compromise the objective of the electronic surveillance system.

The Subject may request that access to recordings made of their own person—and those of their own person only—be limited. The request to sequester the data must be sent to the Privacy Protection Manager along with the reason and the expected duration thereof.

The Data Handler shall record all steps of the sequestering procedure, which will be stored by the Data Handler's organization for one year.

10. Handling data acquired from a third party

If the User/Partner did not disclose their own data to the Data Handler but those of another natural person, it is the responsibility of said User/Partner to ensure that said natural person is aware and adequately informed of their data being provided, and that they have given their consent to it. The Data Handler is not obligated to verify whether said User/Partner has ensured the above. The Data Handler reminds Users and Partners that if they choose to disclose the data of a third party without providing them with adequate information and/or obtaining their consent, and said third party seeks legal proceedings against the Data Handler for this reason, then the claims or the sum of the related payments may be passed on to the User/Partner by the Data Handler.

11. Rights of the data subject

The Subject, through the contact points listed in section 1, may:

- Request information on the handling of their personal data;
- Request rectification of their data;
- Request the deletion of their own personal data and limitation of data handling.

The Subject may exercise the above rights at any time.

Additionally, the Subject may do the following through the contact points listed in section 1:

- Request the Data Handler to transfer their data to another data processing service provider on the condition that the data handling is based on a contract agreement or consent, and the Organization handles it within the framework of an automated policy.
- Demand to withdraw their earlier consent to data handling.

Within one month—in special cases, within a lengthened period specified the applicable laws—of receiving the request, the Data Handler shall accommodate the request or refuse it. In the latter case, a reason must be supplied. The results of the examination shall be sent to the Subject in writing.

11.1 Costs of providing information

The Organization provides the privacy protection services and the necessary information **free of charge** for the first time.

If the Subject requests their data for a second time within one month, which have not changed in the meantime, the Data Handler shall charge administrative fees.

- The administrative costs are calculated by projecting the current minimum wages projected as an hourly fee.
- The number of working hours multiplied by the above hourly fee.
- Additionally, if paper-based information providing is requested, a printing fee (at cost price) and a mailing fee is added.

11.2 Refusal of information

If the Subject's request is clearly **unfounded**, or they are not authorized to receive the information, or if the Organization, as the Data Handler, has evidence that the Subject possesses the requested information, the Data Handler may refuse the request for information.

If the Subject's request is **excessive**—especially due to its repetitive nature—the Organization may refuse to adhere to the request provided that:

- the Subject requests to exercise their rights outlined in Articles 15-22 for the third time within the period of one month.

11.3 Right to object

The Subject has the right to object to the handling of their personal data based on legitimate interest or on founded appropriate legal basis by public authorities.

In such cases, the Organization may not handle the personal data any longer, except if they can prove that the data handling is enforced by such legal reasons that have a priority over the Subject's interests, rights and freedoms, or if the data handling is necessary to allow for making and proving legal claims, or for the protection of legal interests.

If the Data Handler ascertains that the objection is legally founded, the data handling is ceased as soon as possible, including data transfers and further data recording. Additionally, the Data Handler shall inform all third-party data processing service providers to whom they previously transferred the Subject's data of the cessation of further data handling.

Carrying out the request is free of charge except in cases of unfounded or excessive demands, for which the Data Handler may charge a reasonable fee that equates to their administrative costs.

If the Subject disputes the Data Handler's decision, they may refer the matter to the court.

12. Making the collected data public

The Data Handler shall not make the recordings of the electronic surveillance system public.

13. Information on data security policies

Data shall be handled in a closed system in accordance with their Information Security Policy.

The Data Handler shall ensure the application of default and integrated data protection systems. The Data Handler shall use the appropriate technical and organizational measures to ensure the following:

- Accurately regulated data access;
- Access is only provided to persons who require it to carry out the related tasks, and these persons access the bare minimum amount of data needed for the related tasks;
- The Data Handler's commissioned data processing service providers are selected carefully, and appropriate contracts are made with them to ensure data security;
- The Data Handler shall ensure the integrity, authenticity and protection of the handled data.

The Data Handler shall employ reasonable physical, technical and organizational safety measures to protect the Subjects' data, especially to prevent accidental, unauthorized or illegal destruction, loss,

change, transfer, use, access or processing thereof. The Data Handler shall immediately inform the Subject if they become aware of unauthorized access or use of the Subject's data that poses a high risk to the Subject's interests.

If transfer of the Subject's data is necessary, the Data Handler shall ensure appropriate protection of the transferred data, e.g. the encryption thereof. The Data Handler assumes full responsibility for data handling carried out by third parties.

The Data Handler shall make appropriate and regular backups of data to ensure that the Subject's data are protected against loss or destruction.

14. Analytical services

The Data Handler uses Google Analytics to track page statistics, user demographic data, interest and website behavior. Additionally, the Organization uses Google Search Console to optimize searches and to measure user satisfaction. Google allows limiting the use of analytical services. If you wish to opt out from your data being used by Google Analytics, navigate to Google's site:

<https://tools.google.com/dlpage/gaoptout>

15. Applicable laws

Applicable laws related to the Data Handler's handling of data:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, "GDPR");
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Privacy Act");
- Act C of 2000 on Accounting;
- Act V of 2013 on the Civil Code;
- Act CLV of 1997 on Consumer Protection;
- Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators ("Security Services Act").

16. Appeals

If the Subject believes that their rights relating to the handling of their personal data have been violated, they may refer the matter to court. In Budapest, the Subject may turn to the Capital Court, or request an investigation from the Hungarian National Authority for Data Protection and Freedom of Information ("NAIH").

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