

## PRIVACY NOTICE

INRIMAS Kft.

15 MARCH 2024

As data controller, **INRIMAS Kft.** respects the privacy of all persons who provide personal data to it and is committed to the protection of such data. The controller provides the following information in accordance with Article 13 of the General Data Protection Regulation of the European Union (Regulation (EU) No 679/2016, hereinafter: “**GDPR**”):

**INRIMAS Kft.** processes the personal data it collects confidentially, in accordance with data protection legislation and international recommendations, in line with this Privacy Notice (hereinafter: the “**Notice**”), and takes all security, technical and organisational measures to ensure the security of the data.

This Notice sets out the principles for the processing of personal data provided by Data Subjects.

The purpose of this Notice is to provide detailed information on all relevant facts concerning the processing of personal data of persons who establish customer contact with **INRIMAS Kft.** (hereinafter the “**Company**” or “**Controller**”) as the controller, or other contracting or cooperating partners, or persons who enter the registered office of the Company (hereinafter the “**Customers**”), or visitors to the [www.inrimas.hu](http://www.inrimas.hu) website (hereinafter the “**Website**”) operated by the Company (hereinafter collectively “**Data Subjects**”) when using the services (hereinafter the “**Service**”) provided by the Controller, in particular, the purposes and legal basis of the processing, the persons who are authorised to process the data, the duration of the processing and who has access to the data in accordance with the provisions of the GDPR.

The Company will inform the data subject about other processing operations of personal data in other information notices, policies or at the time of data collection.

The current version of this Notice is permanently available **on the Company’s website**. The Data Subject acknowledges and accepts the following and consents to the processing as set out below.

Company name:	<b>INRIMAS Korlátolt Felelősségű Társaság</b>
Registered office:	H-1046 Budapest, Klauzál utca 10.
Company registration number:	01-09-417899
Website:	<a href="http://www.inrimas.hu">www.inrimas.hu</a>
Represented by:	Gábor Pap, CEO József Kerékgyártó, Managing Director
Phone:	+36 30 322 29 05
E-mail:	<a href="mailto:info@inrimas.hu">info@inrimas.hu</a>
Data protection contact person:	<a href="mailto:info@inrimas.hu">info@inrimas.hu</a>

## **1. Data Subjects and scope of the Notice**

The scope of this Notice extends to anyone whose personal data is processed by the Company for business purposes or whose data is provided to the Company. By transmitting his or her personal data to the Company, the Data Subject accepts the provisions of this Notice and consents to the processing of his or her data in accordance with this Notice.

The personal scope of this Notice extends to the Company as Controller, to the persons whose data are included in the processing covered by this Notice and to the persons whose rights or legitimate interests are affected by the processing.

The Company primarily processes the data of natural persons who have contacted the Company electronically, by sending their data to the e-mail address [info@inrimas.hu](mailto:info@inrimas.hu), or by telephone or in person for the purpose of establishing a customer relationship, have requested a quote, or use or have requested the Company's services, or have contacted to the Company's contact details for reasons or purposes other than establishing a customer relationship, or who enter the Company's registered office. The Company also processes the data of its natural person Customers, as well as the data of the representatives and contact persons of its non-natural person Customers and the data that may have been provided by other Customers.

In the case of personal data of Data Subjects where the Data Subject and the person providing the personal data relating to the Data Subject are not the same, the person providing the data is responsible for ensuring that he or she has the appropriate authorisation from the Data Subject in respect of the data provided and is obliged to inform the Data Subject of the provisions of this Notice.

The scope of this Notice covers all of the Company's processing of personal data on an electronic and/or paper basis.

This Notice is effective from 01.04.2024 until further notice or until revoked. The Company is entitled to amend this Notice unilaterally.

## **2. Definitions and interpretation**

For the purposes of this Notice, certain definitions set out below shall have the following meanings:

*'personal data'* means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

*'processing'* means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

*'controller'* means the Company, as well as the natural or legal person or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

*‘processor’* means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

*‘recipient’* means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

*‘third party’* means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

*‘consent’* of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her; him or her;

*‘sensitive data’* means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, health data or data concerning a natural person’s sex life or sexual orientation;

*‘health data’* means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

*‘transfer’* means providing access to personal data to a specific recipient;

*‘personal data breach’* means a breach of security in relation to the processing of personal data leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted or stored or otherwise processed.

Other definitions defined by the GDPR are set out in Article 4 thereof.

### **3. Purposes and legal bases for processing, legal safeguards in place, storage of personal data**

#### **The general purposes of the processing carried out by the Company:**

- (a.) In relation to the performance of the Company’s activities and the provision of the Service by the Company, to process the data of natural persons who are Users of the Service or, in the case of legal person Customers, of their employees or provided by the Customers, for the purposes of preparing, concluding and performing contracts, as well as for the compliance with legal obligations and the maintenance of customer relations;
- (b.) To process the Data Subject’s data in connection with ensuring the rights and fulfilling the obligations arising from the contractual relationship (including the use of the Services and the fulfilment of orders, as well as the processing of the data of the Customer’s contact persons);
- (c.) To process the personal data of potential Customers for direct marketing purposes on the basis of the Company’s legitimate interest;

- (d.) To comply with the legal obligations and enforce the legitimate interests of the Data Subject and the Company;
- (e.) To transmit the data of the Data Subject to business partners, where this is unavoidable and facilitates the provision of the Service to the Data Subject and with the Data Subject's prior consent;
- (f.) After the termination of the contract with the Company, to exercise the rights and perform the obligations arising from the contract or the provision of the Service, in particular to enforce any claims under the contract or arising from the provision of the Service;

#### **Legal bases for processing:**

- (a.) The legal basis for processing is primarily the prior, voluntary consent of the Data Subject, based on prior information provided by the Controller, and its general purpose is to ensure the provision of the Service and to maintain contact. In addition, the Company processes the data in order to provide the Service, for compliance with a legal obligation to which it is subject, or for the purposes of the legitimate interests pursued by the parties.
- (b.) In case of voluntary provision of data by the Data Subject, the Company processes the personal data with the consent of the Data Subject. Voluntary consent by the Data Subject shall also be understood to mean the behaviour by which the Data Subject, by using the Website, accepts that all regulations relating to the use of the Website, including this Notice, shall automatically apply to him or her.
- (c.) The Data Subject has the right to withdraw his or her consent at any time, however, under the GDPR, if the personal data have been collected with the consent of the Data Subject, the Company may process the collected data for the purpose of complying with a legal obligation to which it is subject, unless otherwise provided by law, or for the purposes of pursuing its own legitimate interests or the legitimate interests of a third party, where such interests are proportionate to the restriction of the right to the protection of personal data, without further specific consent, even after the Data Subject has withdrawn his or her consent. The withdrawal of consent shall not affect the lawfulness of processing before its withdrawal. Processing is mandatory in cases required by law.
- (d.) In the case of personal data of Data Subjects where the Data Subject and the person providing the personal data relating to the Data Subject are not the same, the person providing the data is responsible for ensuring that he or she has the appropriate authorisation from the Data Subject in respect of the data provided and is obliged to inform the Data Subject of the provisions of this Notice.
- (e.) The Company also draws the attention to the fact that, in certain cases, the possible consequence of not providing data may be increased difficulties in maintaining business relations during the period of the Service, or the performance of the Service itself, or the provision by the Data Subject of the data to be provided in the course of certain processing activities may be a condition for the use of the Services provided by the Company.

#### **Scope, limits and basic principles of the processing**

The Company will process the personal data of Data Subjects only to the extent and for the duration necessary for the purposes set out above. Only personal data that is necessary for the purposes for which it is processed and is adequate to achieve those purposes may be processed.

The Company will take all necessary measures to ensure that personal data is accurate, complete and up-to-date. However, given that Data Subjects are responsible for the accuracy of the data they provide, in the event of a change to their data, Data Subjects are required to notify the Company of the new data as soon as possible after the change, but no later than 3 working days after the change, where necessary, using the contact details set out in this Notice.

#### **Source of data:**

The Company receives the data of Data Subjects either directly from the Data Subjects or from its Customers who provide the Company with the data of their contributors, employees or business partners as Data Subjects.

#### **Duration of the processing:**

The duration of the processing is as set out below, provided that each processing purpose may set a different duration of processing and therefore the processing periods detailed in each processing purpose will prevail.

As a general rule, the duration of the processing is (i) until the purpose of the processing has been achieved and the personal data has been erased; (ii) until the Data Subject's consent to the processing has been withdrawn and the personal data of the Data Subject has consequently been erased; (iii) until the decision of the competent court/authority on the erasure has been executed; (iv) unless otherwise provided by law, until the limitation period for the enforcement of rights and obligations arising from the legal relationship on the basis of which the Company's processing is based, which is 5 years pursuant to Act V of 2013 on the Civil Code.

Where processing is required by law, the relevant law will determine the duration of the processing. Invoices issued are subject to a retention period of 8 years in accordance with the provisions of the Act on the Rules of Taxation and the Act on Accounting.

The personal data specified in this Notice will be retained by the Company for the period specified in this Notice as a general rule, subject to the exceptions set out in the sections on specific processing purposes, and will then be erased or will be erased at the request of the Data Subject or in the event of withdrawal of the Data Subject's consent to the processing of his or her data.

#### **4. Description of each type of processing:**

### Processing of visitors' data on the Website

When you access the Website, certain data generated during your visit may be automatically recorded on the server hosting the Website. The data that are automatically recorded are automatically logged by the system when the Data Subject visits the Website (hereinafter the “User”) without any special declaration or action on the part of the Data Subject. The system processes these data for the shortest period of time necessary for the provision of the Service and for operational security, typically less than 1 day, after which the data are overwritten, i.e. deleted. For example, the following data may be stored in this way: IP address, browser data, visit parameters.

Purpose of the processing: during a visit to the Website, the Website hosting provider records visitor data in order to monitor the operation of the Service and to prevent misuse.

Legal basis for the processing: voluntary consent of the Data Subject

*Scope of processed data: session ID*

*Purpose of the processing: identification*

Duration of the processing: 3 days from the date of visiting the Website.

### Cookies strictly necessary for the functioning of the Website

Such cookies are essential for the proper functioning of the Website. Without the acceptance of these cookies, the Company cannot guarantee that the Website will function as expected, nor that the User will have access to all the information he or she is looking for. The data stored by these cookies do not “collect” personal data for marketing, analytics, etc. purposes, but are only necessary for the basic functioning of the Website.

Legal basis for the processing: The Controller has a legitimate interest, i.e. the User's consent is not required, if the sole purpose of the use of cookies is the transmission of communications over an electronic communications network or if the cookies are strictly necessary for the Controller as a service provider to provide an information society service expressly requested by the subscriber or user.

Scope of processed data: Unique identification number, dates, times

Purpose of the processing: Identifying Users and tracking visitors.

Data Subjects: Visitors to the website

Duration of the processing: In the case of cookies, the duration of the processing lasts until the end of the visit to the website.

### Contact, request for information

Data Subjects can contact the Company via the Website or by sending an e-mail to the Company's e-mail address (**Contact us**) or request information from the Company by providing certain details. Prospective Customers of the Company may contact directly the Company's designated contact person.

Data Subjects: natural persons who contact the Company and request information from the Company by providing personal data.

Legal basis for the processing: consent of the Data Subject (Article 6(1)(a) GDPR).

Scope of processed data , purpose of the processing :

- name/identification
- e-mail address/contact, communication
- message date/identification
- message subject and text/response
- other personal data provided by the Data Subject/response

Duration of the processing: the time necessary for achieving the purpose of the processing, which may not exceed 5 years from the date of the disclosure of the data or the time limit for exercising any right to pursue claims, but not longer than the withdrawal of consent. If no contract or agreement is concluded between the Company and the Data Subject (or the company represented by the Data Subject) following the pre-contractual processing, the Company will delete the message(s) after the communication has been closed, provided there is no other purpose for the processing.

### Processing of contact details

The Company may process personal data in the course of its business activities, if such data is transmitted to it by the Data Subject or the other contracting party (legal person). The Company presumes that its Customers and Business Partners have appropriate authorisation or consent from the Data Subject in respect of data relating to a natural person that they provide to us.

Data Subjects: natural persons establishing a business relationship or legal persons providing natural person data and persons acting on behalf of such legal persons.

Source of the data: the Data Subject or the Company's business partner, the contracting party.

The purpose of the processing is to enable the Controller to contact the Customer and the Customer's employee, contact person, i.e. the Data Subject, directly if necessary, and to maintain contact in matters concerning the Controller and the Customer.

Scope of processed data/Purpose of the processing:

name/identification

e-mail address/contact



phone number/contact

Legal basis for the processing: The Controller processes the data of the Data Subjects in order to contact the Customer. The legal basis for the processing is the legitimate interest of the Controller (Article 6(1)(f) GDPR),

Duration of the processing: Duration of the processing: the time necessary for achieving the purpose of the processing, which in some cases may correspond to the existence of a contractual relationship, but not longer than until the withdrawal of consent or the time limit for exercising any right to pursue claims (5 years from the performance of the contract (limitation period)) and the period provided for by accounting law (8 years from the date of the provision of personal data by the data subject, the date of the annual report, business report or accounting report for the financial year in question).

### **Activities performed by the Company as a processor**

The Company is, in certain cases, a Processor in relation to the Service it provides to its Customers, with respect to the data provided to it by its Customers as Controllers.

The Company undertakes and provides appropriate safeguards to ensure that the processing activities it carries out as a Processor comply with the requirements of the GDPR, and that appropriate technical and organisational measures are implemented to ensure the protection of the rights of Data Subjects. In this context:

- The Company shall process the data on the instructions of the Controller, in accordance with the data protection rules and principles and shall take into account the contractual obligations of the Controller known to the Processor.
- The Company may not modify, delete, copy, link to other databases, use for any purpose other than the underlying contract or for its own purposes, or disclose to third parties the data provided to it by the Controller, except to the extent expressly required by the Controller and necessary for the purposes of the processing.
- The Company is not entitled to represent the Controller or to make any statement on behalf of the Controller, unless expressly authorised to do so by an agreement with the Controller or other document.
- The Company stipulates that the Controller has the exclusive right to determine the purposes and means of the processing of the data provided to the Processor.
- The Company, as Processor, shall ensure the security of the data and shall take all technical and organisational measures necessary to enforce the data protection rules, accordingly it shall take measures against unauthorised access to, unauthorised alteration, transmission, disclosure, deletion or destruction of the data. It shall also take appropriate measures against accidental destruction or damage and against inaccessibility due to technical changes.
- The Company, as Processor, shall only grant access to the data to those of its employees who need it for the purposes of carrying out the processing activities and shall inform those

who have access of the security and confidentiality obligations and ensure that they are bound by confidentiality obligations.

- The Company, as Processor, undertakes to cooperate with the Controller in order to enable the Controller to comply with its legal obligations. In particular, the cooperation covers the following areas: the execution of requests related to the fulfilment of the Data Subjects' right of access, erasure and rectification within the legal time limits.
- The Company, as Processor, undertakes to modify, supplement, correct, block or delete the data it processes in accordance with the instructions of the Controller.
- The Company shall promptly notify the Controller of any events or risks affecting the security of the data, take measures to address them and cooperate fully with the Controller.
- The Company undertakes to cooperate fully with the Controller in any audit or investigation of its systems, records, data, information and procedures relating to the processing of data.
- The Company will delete personal data that is not required to be stored and retained by this Notice or by law after the provision of the Service that forms the basis of the processing has been completed.

The Company, as Processor, shall only be liable for damages if it has not complied with the instructions of the Controller or the provisions of this Notice or the legal provisions applicable to the Processor. The maximum liability of the Company as Processor for direct or indirect damage caused by it to the Controller or third parties shall be limited to the amount of the service fees paid to the Processor in the year in which the damage occurred.

The Company reserves the right to engage sub-processors for the processing activities described in this clause by amending this Notice, which shall be expressly accepted by the Data Subjects.

### **Processing related to complaint handling**

The Company shall provide the opportunity for the Data Subject to communicate his or her complaint regarding the service provided and/or the Company's conduct, activity or omission orally (in person, by phone) or in writing (e-mail, post).

Data Subjects: any natural person who wishes to lodge a complaint regarding the service provided and/or the Company's activities.

Purpose of the processing: to enable a complaint to be lodged, to identify the Data Subject and the complaint, to record data required by law, to maintain contact and to handle complaints.

Legal basis for the processing: The consent of Data Subjects and the legitimate interest of the Data Subject (Article 6(1)(f) GDPR) or the performance of a legal obligation (Article 6(1)(c) GDPR).

Scope of processed data/Purpose of the processing:  
name/identification

postal address/notification  
e-mail address/notification  
phone number/notification  
subject of complaint/investigation of complaint  
complaint ID/registration of complaint

Oral complaints will be promptly investigated by the Company and resolved as necessary. If the Customer does not agree with the handling of the complaint or if it is not possible to investigate the complaint immediately, a record of the complaint will be made and a copy will be given to the Customer.

The record of the complaint includes the following:

- the name of the Customer;
- the Customer's address, registered office and, where applicable, postal address;
- where, when and how the complaint was lodged;
- a detailed description of the Customer's complaint, with the objections covered by the complaint recorded separately, in order to ensure that all the objections contained in the Customer's complaint are fully investigated;
- a list of documents, records and other evidence produced by the Customer;
- the signatures of the person who made the record and of the customer (the latter formality is required in the case of an oral complaint made in person);
- the place and time of making of the record.

Duration of the processing: The Company shall process the record of the complaint and a copy of the reply for five years pursuant to Section 17/A(7) of Act CLV of 1997 on Consumer Protection.

### **Use of an electronic surveillance system (camera)**

The Company uses a camera system at its headquarters at the Company's registered office to enforce property security and accident prevention requirements.

The legal background to the operation of the camera system:

- Act CXXXIII of 2005 on the Rules of Private Security and Private Investigation (hereinafter "PSI Act"),
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter "Privacy Act"),
- GDPR

The legal basis for the processing is the Data Subject's voluntary consent on the basis of the Operator's information in the form of signs and the camera policy available at the reception (Article 6(1)(a) GDPR). Consent may also be given in the form of implied conduct. In particular, the Data Subject's access to or presence in the units covered by the CCTV system shall be considered as implied conduct.

The rules for operating the camera system are set out in a separate information and camera policy, which is available at the Company's registered office and stores.

### **Processing of data of persons concerned by a job application**

With respect to job applications sent to the Company, the Company provides information on these data processing practices in its Privacy Notice on Job Applications, and contacting the Company requires that you read and accept the terms of that Notice.

### **5. Persons authorised to have access:**

Only employees of the Company who need to have access to the data in order to perform their job duties are entitled to access the data. Persons who have access to personal data at the Company are bound by confidentiality obligations with regard to the personal data of Data Subjects, i.e. they must treat personal data and other information obtained in the course of their duties or otherwise as confidential and not disclose it to third parties.

### **6. Data security**

The Company takes into account the requirement of data security in the design of its entire data protection process. The Company aims to minimise the processing of personal data in order to reduce the risks of processing.

The Company shall ensure that the data security rules provided for in the applicable legislation are applied. When determining and applying measures to ensure the security of the data, the Company shall take into account the state of the art and shall choose among several possible processing solutions the one which ensures a higher level of protection of personal data, unless this would involve a disproportionate effort. The Company shall take the technical and organisational measures and establish the procedural rules that are necessary to enforce the applicable laws, data protection and confidentiality rules.

The Company shall take appropriate measures to protect the data against unauthorised access, alteration, transmission, disclosure, deletion or destruction, accidental destruction or accidental damage and against inaccessibility resulting from changes in the technology used.

As part of its data security responsibilities, the Controller

- takes technical and organisational measures to secure electronically stored data;
- ensures that the data security rules required by law are enforced;
- ensures that data protection and confidentiality rules are enforced;
- prevents unauthorised access to data;
- takes the necessary measures to prevent any damage to the data;
- promotes data processing awareness among its employees to ensure data security;
- ensures the physical protection of data stored on paper;
- ensures the physical protection of the devices used for electronically stored data;
- ensures password protection of electronically stored data;
- ensures that data are backed up regularly;

- ensures that access to data is restricted to authorised persons.

The Company shall ensure the security of data processing by taking technical and organisational measures that provide a level of protection appropriate to the risks associated with the processing, by selecting the IT tools used and by operating them in such a way that the processed data:

- (a) are accessible to authorised persons (availability);
- (b) are authentic and verified (authenticity of processing);
- (c) can be verified to be unaltered (data integrity);
- (d) are accessible only to the authorised person and protected against unauthorised access (data confidentiality).

In order to enforce data security conditions, the Company shall ensure that the relevant employees are adequately trained. The Company shall provide the expected level of protection when processing the data, in particular in relation to their storage, rectification and erasure, and in the event of a request for information or an objection by the Data Subject.

### **Backup**

The Company backs up its electronically stored data on a daily basis. The Controller stores the backups on its own server.

Legal basis for processing data relating to backups: the Company's legitimate interest (Article 6(1)(f) GDPR) to comply with the requirements of the GDPR and to ensure the continuous and uninterrupted availability of data generated in the course of its activities. The Company processes a significant amount of data, and there is a significant public interest in the secure storage of such data and their recovery in the event of damage.

Purpose of the processing: to increase data security, to retain documents related to the operation of the Controller and to recover them in case of a possible data security problem, to ensure the continuity of work processes.

Duration of backup storage: up to 5 years.

## **7. Storage of personal data, processing**

Personal data are stored in paper and electronic form on the Company's servers at the Company's registered office.

## **8. Use of processors, data transmission**

The Company uses the services of third parties to achieve the processing purposes set out in this Notice, to comply with legal obligations and to perform its functions, which may include the processing of the Data Subjects' personal data. This third party (hereinafter the "Processor") shall carry out the processing in accordance with the instructions of the

Company and in compliance with the provisions of the applicable legislation. For the purposes of processing, only the personal data necessary for the fulfilment of that purpose will be transmitted to each Processor.

## 9. Personal data breach handling

The Company makes every effort to avoid personal data breaches. Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

The Controller shall immediately notify the National Authority for Data Protection and Freedom of Information of the personal data breach, unless the personal data breach is unlikely to pose a risk to the rights and freedoms of the Data Subjects. The Controller shall keep a record of the personal data breaches, together with the actions taken in relation to the breach. Where the breach is serious (i.e. likely to pose a high risk to the rights and freedoms of the data subject), the Controller shall inform the Data Subject of the personal data breach without undue delay.

## 10. Rights of the Data Subject in relation to the processing

The Company draws the attention of Data Subjects to the fact that *in the event of a complaint or comment, it is advisable to contact the Company as Controller using one of the contact details indicated in this Notice.*

### Rights of the Data Subject:

#### *(a) Information/right of access*

The Data Subject shall have the right to obtain from the Company confirmation as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to be informed about the personal data being processed, the purposes of the processing, the categories of data, the recipients, the storage period, his or her rights and the source of the data.

The Company shall provide the Data Subject with a copy of the personal data subject to processing. For additional copies requested by the Data Subject, the Company may charge a reasonable fee based on administrative costs.

#### *(b) Rectification and erasure*

The Data Subject shall have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### *(c) Erasure/right to be forgotten*

The Data Subject shall have the right to obtain from the Company the erasure of personal data concerning him or her without undue delay where the purpose of the processing has ceased to exist, where the Data Subject has withdrawn his or her consent to the processing and there is no other legal basis for the processing, where the personal data have been unlawfully processed.

*(d) Restriction of processing of data*

The Data Subject shall have the right to obtain from the Company restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the Data Subject, for a period enabling the Controller to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Company no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; or the Data Subject has objected to the processing pending the verification whether the legitimate grounds of the Company override those of the Data Subject.

Where processing has been restricted under the above, such personal data shall, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

The Company shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

*(e) Right to data portability*

The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company where the processing is based on consent and the processing is carried out by automated means. In exercising his or her right to data portability, the Data Subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise of this right shall be without prejudice to the right to erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The exercise of the right shall not adversely affect the rights and freedoms of others.

*(f) Objection*

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The Company shall

no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above shall not apply if the decision:

- is necessary for entering into, or performance of, a contract between the Data Subject and the Company; - is authorised by Union or Member State law to which the Company is subject and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests; or
- is based on the Data Subject's explicit consent.

*(g) Right to withdraw consent*

Where the processing of the personal data is based on the Data Subject's consent, the Data Subject shall have the right to withdraw such consent at any time. In the event of withdrawal of consent, the processing will be terminated by the deletion of your personal data, provided that there is no other legal basis for the processing of your personal data. Withdrawal of consent has no consequences for the Data Subject. However, the withdrawal of your consent shall not affect the lawfulness of the processing carried out on the basis of your consent before its withdrawal.

**11. Procedure in case of a request by the Data Subject:**

*The Data Subject may contact a representative of the Company at any of the contact details indicated in this Notice with any of the above requests or other questions or requests concerning his or her personal data.*

The Company must consider the request within 30 days of receipt of the written request. If necessary, taking into account the complexity of the request or the number of pending requests, the Company may extend the time limit for processing the request. The Data Subject must be informed in advance of the fact of the extension and the reasons for it.

If the Data Subject's request is justified, the Company will implement the requested measure within the procedural time limit and will inform the Data Subject in writing of the implementation. If the Company rejects the Data Subject's request, it shall issue a written decision to that effect. In its decision, the Company shall state the facts on which the decision is based, the reasons for the decision, with reference to the relevant legislation and case law, and shall inform the Data Subject of the legal remedies available against the decision of the Company.

If the Data Subject does not agree with the Company's decision or if the Company fails to comply with the relevant procedural time limit set out above, the Data Subject may refer the matter to the supervisory authority or to a court.



## 12. Supervisory authority

If the Data Subject considers that the processing of his or her personal data by the Company violates the provisions of the applicable data protection legislation, in particular the GDPR, he or she shall have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information.

Contact details of the National Authority for Data Protection and Freedom of Information:

Website: <http://naih.hu/>

Address: H-1055 Budapest, Falk Miksa utca 9-11.

Postal address: H-1363 Budapest, Pf. 9.

Phone: +36-1-391-1400 Fax: +36-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

The Data Subject shall also have the right to lodge a complaint with a supervisory authority established in another EU Member State, in particular in the EU Member State of his or her habitual residence, place of work or place of the alleged infringement.

## 13. Right to bring an action (right to go to court)

Irrespective of his or her right to lodge a complaint, the Data Subject may go to court if his or her rights under the GDPR have been infringed in the processing of his or her personal data.

The Company, as a Hungarian Controller, may be sued before a Hungarian court.

If the Data Subject wishes to bring an action against the Processor, such action must be brought before the courts of the Member State in which the Processor is established.

The Data Subject may bring the action in the regional court of the place where he or she resides or is domiciled. In Hungary, the contact details of the regional courts can be found at the following link: <http://birosag.hu/torvenyszekek>.

If the Data Subject has his or her habitual residence in another Member State of the European Union, the action may also be brought before the competent court of the Member State of habitual residence.

## 14. Miscellaneous provisions

The Company reserves the right to unilaterally amend this Notice at any time.

This Notice is effective until further notice or until revoked.