

PRIVACY NOTICE



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1.Introduction

The operation of the www.ienergy.hu website and the related online customer support service operated by Mapev Building Ltd. involves the processing of personal data in the course of providing support to customers, and we provide the following information pursuant to Article 13 (1) - (2) of the GDPR.

Mapev Building Ltd. (hereinafter referred to as the "Data Controller") reserves the right to amend this information at any time. If there is a change in any circumstance in the data management of the Data Controller, this notice will be amended within 30 days. This notice will be posted on the website operated by the Data Controller and at the Customer Service Office. The changes will be consolidated in this notice, which will be published by the Controller on its website and in its customer service.

If the Data Controller is not in a position to verify the personal data provided to it, the person providing the personal data shall be responsible for the truthfulness and accuracy of the personal data provided. The Data Controller reminds the data subjects to help the Data Controller to keep the personal data provided by them up to date and to notify the Data Controller of any changes to the data.

The Controller carries out a number of processing activities in relation to its activities, the vast majority of which are related to business activities based on a service or sales contract. However, there are other processing operations, such as those required by law or with the consent of the data subject.

Please be informed that the Data Controller carries out each processing operation on a different legal basis, which, depending on the legal basis of the processing, may involve different data subject rights. The content of data subjects' rights to their personal data is described in detail in Chapter 4.

For each processing operation, we indicate the data subject's exercise of the data subject's rights and present an overview table of the data subject's rights in the legal basis of the processing operation in section 4.11.

1.1. Information about the Data Controller

Name:	MAPEV Building Limited Liability Company.
Seat:	2941 Ács Cukorgyár-telep 14.
Location:	1106 Budapest Jászberényi út 24-36(iEnergy)
Represented by:	Miklós Vojvoda Managing Director
Company registration number:	11 09 019750
Name of the registering authority:	Metropolitan Court of Registration
Name of the bank holding the account:	OTP Bank ZRT.
Tax number:	23750328-1-11
Mobile number:	+36304671775
Your email address:	mapevkft@gmail.com
Website:	https://ienergy.hu/

2. Short summary about your data protection rights

How can you request information about the processing of your personal data?

At your request, the Data Controller will provide you with information about your data processed by the Data Controller (or by a data processor appointed by the Data Controller). Such as the source of the data, the purpose, legal basis and duration of the processing, the

name and address of the data processor and its activities in relation to the processing, the circumstances of the personal data breach, its effects and the measures taken to remedy it, and, in the case of a transfer of personal data of the data subject, the legal basis and the recipient of the transfer. The Data Controller shall fulfil its task of providing information within 30 days of receipt of your request.

The Data Controller will consider a request for information sent by mail as authentic if the user can be clearly identified on the basis of the request sent. A request for information sent by e-mail shall be considered authentic by the Data Controller only if it is sent from the e-mail address of the user, but this does not preclude the Data Controller from identifying the user in another way before providing the information. In order to comply with the request, the Data Controller shall ensure that the person entitled to exercise the data subject's rights is the person who intends to do so. For this purpose, it may be necessary, where justified, for the data subject to appear in person at the controller's headquarters for identification purposes.

When can you request the correction of your data?

If you or the Data Controller becomes aware that personal data it is processing is inaccurate, erroneous or otherwise incomplete, either at your request or through the Data Controller's own action, the Data Controller will correct the incomplete or erroneous data.

When do you have the right to have your personal data deleted?

You may request the permanent and irretrievable deletion of your personal data at any time if the Controller processes your data on the basis of your consent. In the case of processing by the Controller or in your legitimate interest and in order to comply with mandatory legal storage and retention obligations, the Controller cannot erase your data. The Controller shall delete the personal data at the same time as the purpose of the processing ceases to exist. The Data Controller shall also delete the data if it is established that the processing of the data is unlawful for any reason, or if the deletion of the data is ordered by a public authority or a court.

When should we block your personal data?

You may at any time request that the processing of some or all of the data you have provided to the Data Controller be restricted. The Data Controller will not erase the data in the event of your request for erasure, but will block the data if such erasure would harm your legitimate interests. The Data Controller will only process the blocked data for as long as the purpose for which the blocking was requested persists, after which the blocked data will also be deleted.

How can you withdraw your consent to the processing of your personal data?

You have the right to withdraw your consent to the processing of your personal data at any time. The Data Controller will consider the withdrawal of consent sent by mail as authentic if the user can be clearly identified from the request sent. A withdrawal of consent sent by e-mail shall be considered authentic by the Data Controller only if it is sent from the e-mail address of the user, but this does not preclude the Data Controller from identifying the user in another way before providing the information.

Where can you go with your complaint?

You have the right to lodge a complaint about data processing with the National Authority for Data Protection and Freedom of Information.

National Authority for Data Protection and Freedom of Information

1055 Budapest Falk Miksa u. 9-11.

Postal address: 1363 Budapest, Postafiók 9.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

How can you go to court if your rights have been violated?

You have the right to take legal action against the processing. The competent court is the General Court, and you can choose to bring an action against the Controller in the court of your domicile. The court will hear your application in an extra-judicial procedure.

How do we access your personal data?

You provide your personal data to the Data Controller. If the data has not been provided by you, the Data Controller shall, upon detection or notification by you, delete the unlawfully submitted document together with all its data content immediately upon your request.

What do we do to keep your personal data safe?

The Data Controller shall use all reasonable means and technical means at its disposal to ensure the security of the data, and shall take all necessary steps to this end, including strictly limiting access to the data.

What principles do we consider binding in our personal data management?

Personal data:

- a) must be lawful, fair and transparent for the data subject ("lawfulness, fairness and transparency");
- b) collected only for specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes ("purpose limitation") is not considered incompatible with the original purpose in accordance with Article 89(1) of the GDPR;
- c) be adequate and relevant for the purposes for which the data are processed and limited to what is necessary ("data minimisation");
- d) be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without undue delay ("accuracy");
- e) be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR, subject to the implementation of appropriate technical and organisational measures as provided for in this Regulation to safeguard the rights and freedoms of data subjects ("limited storage");
- f) be carried out in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("integrity and confidentiality"), by implementing appropriate technical or organisational measures.
- g) The Controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability").

3. Detailed information on data management

3.1. Description of data processing

Exercising your rights to personal data

Purpose of the processing: to examine and fulfil the requests of natural persons received by the Data Controller relating to the processing of their personal data, to request information on the processing of their personal data, to request access to their personal data, to rectify, erase or restrict the processing of their personal data, to object to the processing of their personal data,

to exercise their right to data portability and to lodge a complaint regarding the processing of their personal data.

Data Subject: customers of the Data Controller who exercise their rights to personal data against the Data Controller

Data subject: the first and last name, contact details and other data necessary to identify the data subject, as well as the data which he or she has provided in connection with the case or request, including, where applicable, special categories of personal data.

Legal basis for processing: Based on Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), to comply with a legal obligation to which the Data Controller is subject.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Recipients and categories of recipients of personal data

The Data Controller may forward the data subject's requests to the NAIH in the event of a request by a public authority, and shall inform the data subject thereof in writing in advance.

Storage period of personal data: 5 years from the date of filing.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

You have the right, through our data processing in relation to the exercise of your data subject rights, to object to the processing of your personal data.

- for information,
- to access,
- for correction,
- to limit,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Chatbot.

Purpose of the processing: the Data Controller operates a Messenger chatbot service available on the Data Controller's social networking site to support its communication with customers. When using this service, a chatbot answers questions posed by interested parties on the basis of keywords found in the questions.

Data Subject: persons using the Messenger service on the Data Controller's social networking site.

Data scope: personal data provided individually by the user, which cannot be categorised in advance.

The Data Controller expressly draws the user's attention to the need to exercise caution when using the chatbot and not to provide the Data Controller with any information other than the data recorded in the first two points of the previous paragraph.

Legal basis for processing: voluntary, specific and informed consent of users (Article 6(1)(a) GDPR).

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Recipients and categories of recipients of personal data

Name: as the hosting provider of the Data Controller and as a separate Data Controller Meta Platforms Ireland Ltd. Headquarters: 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland Privacy Policy: <https://www.facebook.com/privacy/explanation>

The period of storage of personal data

If no order is placed for a product or service, the User's unique identification number is kept for statistical purposes and for the purpose of identifying the User for one year from the date of first activity (if the User does not use the chatbot service again within one year from the date of first activity) or for five years (if the User uses the chatbot service again within one year from the date of first activity).

If the user provides personal data in connection with his/her purchase or use of services in the course of the transaction, the Data Controller shall or may process such data in accordance with the rules relating to the purchase and use of services, according to the types of transactions as set out in this Notice.

We will process the data until consent is withdrawn, but for a maximum of 5 years or until the purpose of the processing no longer applies, after which we will delete it immediately.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our processing of your personal data in connection with the chatbot service, you have the right to

- for information,
- to access,
- for correction,
- to delete,
- to limit,
- the storage of your data processed by automated means,
- and to exercise your right of redress.

Individual customers may withdraw their consent at any time.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Google Adwords conversion tracking

Purpose of processing: the Data Controller uses the Google AdWords online advertising program, within which it uses Google's conversion tracking service. When a website visitor reaches the website via a Google ad, a cookie necessary for conversion tracking is placed on their computer. These cookies have a limited validity and do not contain any personal data that could identify the visitor.

Affected: the user logging in to the website.

Data circle:

Google AdSense and AdMob set cookies and use web beacons (web beacons) to collect information.

The information stored by the cookie (including the User's IP address) is stored on servers of Google Inc. in the United States. Google Inc. may transfer the information collected to third parties where required to do so by law, or where such third parties process the information on behalf of Google Inc.

As part of Google AdSense and Google Ads remarketing, Google Inc. places visitor-tracking cookies on users' devices that track visitors' online behaviour and allow Google Inc. to serve them advertising on other websites based on their behaviour and interests.

The tracking cookie also allows Google Inc. to identify the website visitor on other websites.

A Google Inc. "Privacy Policy" is available at <http://www.google.hu/intl/hu/policies/privacy/>.

For more useful information about Google Inc.'s data-related activities and about disabling cookies and personalisation of ads, please visit the Google Inc. website at <https://adssettings.google.com/anonymous>

Other factsheets are available:

Google AdSense <https://policies.google.com/privacy?hl=hu>

Google Ads <https://www.google.com/intl/en/policies/privacy>

Legal basis for processing: based on the legitimate interest of the Data Controller, Article 6 (1) (f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR).

Demonstration of legitimate interest:

The purpose of Google Adwords is to use advertising material on external websites to draw our customers' attention to our special offers. We can use the data from our advertising campaigns to see how successful they are. We do not collect or process any personal data about you during the advertising process, we only receive statistical data, we cannot identify users.

The client has the right to view the full text of the screening test, which can be requested by sending an email to the email address in point 1.1.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Storage period of personal data: 1 year

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

Recipients of personal data

the hosting provider of the Data Controller and, as a separate Data Controller, Google Inc., 1600 Amphitheatre Parkway, Mountainview, California 94043, USA: <https://www.google.com/policies/privacy/>

In relation to our processing of your personal data in connection with Google Adwords, you have the right to object to the processing of your personal data by us.

- for information,

- to access,
- for correction,
- to protest,
- to limit,
- and to exercise your right of redress.

The data subject may object to the processing, unless there are compelling reasons for continuing to process the personal data (such as the establishment, exercise or defence of legal claims by the Controller), the processing shall be stopped and the data deleted.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Google Analytics conversion tracking

Purpose of processing: The Data Controller uses Google Analytics, a web analytics service provided by a third-party service provider ("Google") of Google, Inc. Google Analytics is used to measure the use of our website, compiling reports on website activity and other services relating to website activity and internet usage. The information generated by the cookie about your use of the website will generally be transmitted to and stored by Google on servers in the United States.

This transfer is subject to Google Privacy Shield certification and a separate data processing agreement we have with Google:

https://support.google.com/analytics/answer/6004245?hl=de&ref_topic=2919631

(about Google Analytics data and data privacy)

Affected: the user logging in to the website.

Data circle:

Google Analytics uses cookies to help the website analyze how users use the site. The information stored by the cookie (including the User's IP address) is stored on servers of Google Inc. in the United States. Google Inc. may transfer the information collected to third parties where required to do so by law, or where such third parties process the information on behalf of Google Inc.

For more useful information about Google Inc.'s data-related activities and about disabling cookies and personalisation of ads, please visit the Google Inc. website at <https://adssettings.google.com/anonymous>

Or other information is available:

Google Analytics

<https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage>

Legal basis for processing: based on the legitimate interest of the Data Controller, Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR).

Demonstration of legitimate interest:

The purpose of using Google Analytics is to obtain information about your use of our website so that we can compile statistical reports on website activity for business purposes, with a view to improving it.

The client has the right to view the full text of the screening test, which can be requested by sending an email to the email address in point 1.1.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Storage period of personal data: 1 year

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

Recipients of personal data

the Data Controller's hosting provider and as a separate Data Controller Google Inc., 1600 Amphitheatre Parkway, Mountainview, California 94043, USA:
<https://www.google.com/policies/privacy/>

In relation to our processing of your personal data in connection with Google Analytics, you have the right to object to the processing of your personal data by us.

- for information,
- to access,
- for correction,
- to protest,
- to limit,
- and to exercise your right of redress.

The data subject may object to the processing, unless there are compelling reasons for continuing to process the personal data (such as the establishment, exercise or defence of legal claims by the Controller), the processing shall be stopped and the data deleted.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Contact for business purposes

Purpose of data processing: the Data Controller processes personal data of natural persons, customers for the purpose of business contacts. If a customer contacts us online, by telephone, by post or in person, we will record your questions so that we can provide you with the appropriate information.

Data Subject: natural persons who have a business relationship with the Data Controller or who propose a business relationship with the Data Controller and natural persons who are contacts of legal person clients.

Data: name (first name, surname), telephone number, email address, postal address, in case of a legal person, title, the question asked by the customer and the content of our answer.

Legal basis for processing:

in the case of a natural person, based on Article 6(1)(a) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), the active consent of the individual

in the case of a contact person of a legal person customer, based on the legitimate interest of the Data Controller in providing the service, as referred to in Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter referred to as "GDPR")

Demonstration of legitimate interest

The Data Controller is responsible for maintaining continuous contact with its business partners, ensuring the flow of products, concluding and fulfilling contracts, and, after the conclusion of contracts, for the processing of data in accordance with the provisions of the Civil Code. 6:62 and thus to avoid breach of contract or delay of contract, the Data Controller has a legitimate interest in the processing of certain specifically defined personal data of natural persons, employees or managers of legal persons and sole traders who are designated as contact

persons for business partners. Without knowing these contact details, it would be completely impossible to maintain the necessary contacts for the ongoing maintenance of the business relationship and to communicate in a timely manner any other relevant information concerning it.

The client has the right to view the full text of the screening test, which can be requested by sending an email to the email address in point 1.1.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Data Controller.

The Controller does not process personal data that it does not collect from the data subject.

Recipients of the processing: forwarded to the Data Controller's hosting provider.

The storage period for personal data: 12 months.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

You have the right to contact us regarding our processing of your personal data.

- for information,
- to access,
- for correction,
- legal entity customer to object,
- an individual customer to cancel, i.e. withdraw consent,
- to limit,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Individual customers can withdraw their consent to be contacted at any time!

Enforcing legal claims

Purpose of data processing: the Data Controller processes personal data of natural person customers in connection with the enforcement of legal claims. The legal enforcement of contractual claims and claims for non-contractual damages requires the processing of personal data.

Data Subject: a person who has a contractual relationship with the Data Controller or who causes damage to the Data Controller.

Data: surname, first name, title, address details (country, postcode, town, street name, house number), telephone number and email address, content of the contract, in case of damage, details of the damage.

Legal basis for processing: based on the legitimate interest of the Data Controller, Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR).

Demonstration of legitimate interest

In the case of processing for claims and enforcement purposes, we must use the customer data provided above to resolve disputes arising from a contract or non-contractual claim with the customer, in order to provide evidence in any litigation, non-litigation or other official proceedings. The Controller will process these data for evidentiary purposes within a limitation period after the purpose of the processing cannot be achieved otherwise.

The client has the right to view the full text of the screening test, which can be requested by sending an email to the email address in point 1.1.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Recipients and categories of recipients of personal data

The Data Controller may transfer the data to a legal representative, a competent court, an MOKK (in the case of an order for payment), a bailiff.

Duration of storage of personal data: until the end of the limitation period for legal claims arising from contract or tort. The general limitation period is 5 years.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

You have the right to bring legal claims against us regarding the processing of your personal data

- for information,
- to access,
- for correction,
- to protest,
- to limit,
- and to exercise your right of redress.

The data subject may object to the processing, unless there are compelling reasons for continuing to process the personal data (such as the establishment, exercise or defence of legal claims by the Controller), the processing shall be stopped and the data deleted.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Send newsletter and E-DM

Purpose of processing: the Data Controller provides marketing information by post or email about its business events, news and latest promotions.

Data subject: natural persons subscribed to the newsletter or e-DM messages and natural person contacts of legal persons.

Data field: name (surname, first name, title), email address, contact person's position in case of legal entity.

Legal basis for processing:

in the case of natural persons, voluntary, specific and informed written consent (Article 6(1)(a) GDPR);

in the case of a legal person, Article 6(1)(f), based on the legitimate interest of the Data Controller in recommending the provision of the service.

Description of the legitimate interest: the processing of personal data relating to the employees of legal persons is indispensable for the sending of newsletters and information related to the activities of the Data Controller to the data subjects. The processing of personal data is also in the interest of the data subjects, given that through the newsletters they can obtain first-hand information about the economic activities of the Data Controller, its various programmes, actions, events and opportunities to participate in them. If the Data Controller does not process the data subject's data in order to achieve this processing purpose, the data subject's right to

be informed and to be informed in due time of the above shall not be exercised or shall be limited. On the basis of the foregoing, it can be concluded that the processing is necessary for the purposes for which the Controller is controller.

The client has the right to view the full text of the screening test, which can be requested by sending an email to the email address in point 1.1.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Data transfer: the data will be transferred to the Data Controller's hosting provider.

The period of storage of personal data

The data will be processed until consent is withdrawn, but for a maximum of 3 years or until the purpose of the processing is achieved.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our processing of your personal data for the newsletter, you have the right to object to the processing of your personal data.

- for information,
- to access,
- for correction,
- to delete,
- to limit,
- the storage of your data processed by automated means,
- and to exercise your right of redress.

Individual customers may withdraw their consent at any time.

Our legal person clients may exercise their right to object.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Posting a customer opinion (comment) on the company's social networking site

Purpose of the processing: to improve the quality of the service, data subjects can give their opinion on the product or service provided by the Data Controller on the Data Controller's social networking site.

Please do not provide any personal information about yourself or others in the comments.

Data Subject: persons who have expressed an opinion on the social networking site of the Data Controller.

Data type: the username and the comments provided by the data subject.

The Data Controller reserves the right to moderate, including the right to unilaterally remove, edit or modify, in whole or in part, without justification and without prior notice, for any reason whatsoever, any postings received, in particular if they infringe the rights, interests, intellectual property rights and rights of reputation of persons and/or legal entities, or if they are unduly repetitive, offensive to generally accepted moral standards of society or deliberately disturb the expression of opinions. In addition, comments must not advertise any product or service.

The User acknowledges that the Data Controller is not responsible for the comments posted by users, their attachments, links and their content, and is not obliged to know the current content

of the comments, or to check the content posted by users, but may remove any content that appears to be offensive or likely to violate the Terms of Use or the law if it is brought to its attention by anyone, in its sole discretion, for any reason that it is objectionable, dishonest, in bad faith or irrelevant to the subject matter.

In particular, they must not violate the honour, reputation, privacy, right to the protection of personal data, right to image, sound, copyright, protected intellectual property, trade secret, or incite to commit unlawful acts or discrimination. By submitting a post, the User waives his/her right to dispose of it and may not claim that the content should be stored, displayed elsewhere or deleted. By posting the content, the User grants the Service Provider the right to use the content in its entirety, without territorial or temporal limitation, and for all purposes.

We believe it is important to inform our users that if a user's profile is deleted or is deleted, the content that they have made available will also be deleted. By using the website, the User accepts that the User is solely responsible for the content and legality of the posts, and therefore agrees not to upload or make available any illegal content.

Legal basis for processing: the data subject's freely given, specific and informed consent (Article 6(1)(a) GDPR).

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Transmission of data

the hosting provider of the Data Controller and the provider of the social networking site of the Data Controller, Meta Platforms Ireland Ltd. 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland, as a separate Data Controller. Its Privacy Notice is available [at: https://www.facebook.com/privacy/explanation](https://www.facebook.com/privacy/explanation)

The period of storage of personal data

The data will be processed until consent is withdrawn, but no longer than the purpose of the processing, and then deleted immediately.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our processing of your personal data, you have the right to object to the recording of customer opinions on the Community site

- for information,
- to access,
- for correction,
- to delete,
- to limit,
- automatically processed data for data portability,
- and to exercise your right of redress.

Individual customers can withdraw their consent at any time

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Facebook community page

Purpose of data processing: the Data Controller exploits the visual and communication opportunities offered by social networking sites in order to promote its products and services.

Data Subject: Facebook users who click on and visit the Facebook page of the Data Controller.

Data type: picture taken, Facebook ID, name given in Facebook profile, content provided by the data subject.

Legal basis for processing: voluntary, specific and informed consent of users (Article 6(1)(a) GDPR).

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

The period of storage of personal data

The data will be processed until consent is withdrawn, but no longer than the purpose of the processing, and then deleted immediately.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

Recipients and categories of recipients of personal data

the hosting provider of the Data Controller, and the Facebook community site as a separate Data Controller, Meta Platforms Ireland Ltd., Headquarters: 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland, Privacy Policy: https://www.facebook.com/privacy/policy?section_id=8-HowLongDoWe

In relation to our processing of your personal data in connection with the Facebook Page, you have the right to

- for information,
- to access,
- for correction,
- to protest,
- to limit,
- and to exercise your right of redress.

The data subject may object to the processing, unless there are compelling reasons for continuing to process the personal data (such as the establishment, exercise or defence of legal claims by the Controller), the processing shall be stopped and the data deleted.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

SESSION ID, COOKIE Cookies required for technical reasons

Purpose of data processing: to ensure secure operation, the website sends a session ID, a code string to identify the computer of the data subject when logging in. In order to serve the data subject more efficiently when browsing the website, short text or numeric identification files (cookies) are placed on the data subject's computer to identify the data subject.

Data subject: the data subject who logs on to the website.

Data circle:

- the Internet Protocol (IP) address of the computer,
- access details,
- is the HTTP response code,

- details of the website from which the request was made,
- the amount of bytes traded during the visit,
- the date and length of the visit,
- details of the pages viewed
- first check-in date
- number of logins

Legal basis for processing: based on the legitimate interest of the Data Controller, Article 6 (1) (f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR).

Demonstration of legitimate interest:

The Data Controller "identifies" the users' computer in order to ensure the continuous operation of its website and to prevent unwanted external interference. The protection of the website cannot be ensured without the implementation of this process.

The client has the right to view the full text of the screening test, which can be requested by sending an email to the email address in point 1.1.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Data transfer: the data will be transferred to the Data Controller's hosting provider.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

The period of storage of personal data

In relation to our use of security cookies, you have the right to object to the processing of your personal data

- for information,
- to access,
- for correction,
- to protest,
- to limit,
- and to exercise your right of redress.

The data subject may object to the processing, unless there are compelling reasons for continuing to process the personal data (such as the establishment, exercise or defence of legal claims by the Controller), the processing shall be stopped and the data deleted.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Convenience and marketing optional cookies and social media button data management

Purpose of data processing: short text or numerical identification files (cookies) are placed on the data subject's computer when browsing the website in order to provide a more convenient service to the data subject.

Data subject: the data subject who logs on to the website.

Data circle:

- the Internet Protocol (IP) address of the computer,
- access details,
- is the HTTP response code,

- details of the website from which the request was made,
- the amount of bytes traded during the visit,
- the date and length of the visit,
- details of the pages viewed
- first check-in date
- number of logins

Legal basis for processing: the data subject's freely given, specific and informed consent (Article 6(1)(a) GDPR).

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Data transfer: the data will be transferred to your hosting provider.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

The period of storage of personal data

In relation to our processing of your personal data in relation to convenience cookies, you have the right to object to the processing of your personal data by us.

- for information,
- to access,
- for correction,
- to delete,
- to limit,
- the storage of your data processed by automated means,
- and to exercise your right of redress.

You can withdraw your consent at any time in the cookie settings.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

You can set the most popular browsers to display cookies by following the links below:

Google Chrome	https://support.google.com/accounts/answer/61416?hl=hu
Firefox	https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalakat-tarolnak-szami
Microsoft Internet Explorer	https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11
Microsoft Edge	https://support.microsoft.com/hu-hu/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy
Opera	https://help.opera.com/en/latest/web-preferences/#cookies
Safari	https://support.apple.com/hu-hu/guide/safari/sfri11471/mac

On our website we use the following social media plug-ins: Facebook, Instagram. The plug-ins can be identified by their social media buttons, which are marked with the logo of the social media network provider.

These extensions were implemented using the so-called 2-click solution. This means that when you navigate the website, your personal data is not initially collected by the social media plug-

in providers. It is only when you click on one of the plug-ins that your personal data is passed on:

When you activate the plug-in, your data is automatically transferred to the relevant plug-in provider and stored by them (for US providers, your personal data is stored in the US). We have no control over the data collected and the processing operations carried out by the service providers, nor do we know the full extent of the data collection, the purposes for which it is collected or the retention periods.

For information on the purpose and scope of data collection and collection by the plug-in provider, please refer to the relevant privacy policy of the service providers, where you will find more information on your rights and privacy options.

Google Inc., 1600 Amphitheatre Parkway, Mountainview, California 94043, USA: <https://www.google.com/policies/privacy/>

YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

X Corp. 1355 Market Street, Sulte 900, San Francisco, CA 94103, USA, <https://twitter.com/privacy>

Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA, <https://help.instagram.com/155833707900388> and

Meta Platforms Ireland Ltd., Headquarters: 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland, Privacy Policy: <https://www.facebook.com/privacy/explanation>

Your personal data will only be transferred to YouTube if you view the videos. We have no control over this transfer, for more information on how we process your personal data, please see YouTube's privacy policy, available at <https://www.google.com/intl/en/policies/privacy/>.

Server logging

Purpose of data management: the Data Controller logs the visits to the website during the visit to monitor the operation of the website and to prevent abuse.

Affected: the user logging in to the website.

Data circle:

- the Internet Protocol (IP) address of the computer,
- access details,
- is the HTTP response code,
- details of the website from which the request was made,
- the amount of bytes traded during the visit,
- the date and length of the visit,
- details of the pages viewed
- first check-in date
- number of logins

Legal basis for processing: based on the legitimate interest of the Data Controller, Article 6 (1) (f) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR).

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

The period of storage of personal data

31 days

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our server logging data management, you have the right to object to the processing of your personal data by us.

- for information,
- to access,
- for the correction,
- to protest,
- to the restriction,
- protest against automatic decision-making,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Registration

Purpose of data processing: the Data Controller provides users with a registration facility on its website to facilitate the ordering of products and services.

Data subject: the person who registers on the website.

Data: name of the registrant, (first name, surname), e-mail address, telephone number.

Legal basis for processing: based on Article 6 (1) (b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), subject to Article 13/A (1) - (2) of the GDPR, processing is necessary for the preparation and conclusion of a contract in which one party is the Data Controller and the other party is the individual concerned.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

The period of storage of personal data

The data will be processed until the conclusion of the contract, if no contract is concluded and the period of the offer has expired without result, the data will be deleted immediately.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our processing of your personal data in connection with your registration on the website, you have the right to

- for information,
- to access,
- for the correction,
- to delete,

- to the restriction,
- for data storage,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Data processing in relation to a business contract

Purpose of processing: the Data Controller processes personal data of natural persons, customers and subcontractors in connection with a contractual relationship. Purpose of the processing:

- proof that the consumer has been informed as required by law,
- proof of the conclusion of the contract,
- the creation, definition, modification and performance of the contract
- monitoring performance and invoicing the resulting fees.

Data Subject: a person who orders a product or service from the Data Controller.

Data subject: name, address, e-mail address, telephone number, product number, order number, order identifier, value of the product, payment method chosen, total purchase price, billing name and address, the name of the individual or business customer, and any other information voluntarily provided to the Data Controller in connection with the contract, as well as any other data included in the order note.

Legal basis for processing: based on Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), subject to Articles 2-4 of Government Decree 304/2009 (22.XII.), processing is necessary for the preparation and conclusion of a contract in which one party is the Data Controller and the other party is the individual concerned.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Recipients and categories of recipients of personal data

It will be forwarded to the Data Controller's hosting provider and to the financial institution chosen by the customer for financing, our accounting company, our account-holding bank and the NAV.

The period of storage of personal data

5 years from the termination of the contract.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our processing of your personal data in connection with the conclusion and performance of a sales contract, you have the right to object to the processing of your personal data.

- for information,
- to access,

- for correction,
- to delete,
- to limit,
- for data storage,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Payment for the service

Purpose of the processing: payment of the consideration for the Data Controller's product or service.

Data subject: a person who pays for the product or service of the Data Controller.

Data type: first and last name, company name, sole trader registration number, tax number, order ID, product and service details, time of transfer.

Legal basis for processing: Based on Article 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), processing is necessary for the preparation and conclusion of a contract where one party is the Data Controller and the other party is the individual concerned.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Recipients and categories of recipients of personal data

Data processed during contracting, invoicing and payment will be transmitted by the Data Controller to the account holder's bank, the company operating the credit card payment system, the accounting company, and the NAV, legal representative, competent court, MOKK (in case of payment order), bailiff.

Data processor used for electronic invoicing

The Data Controller shall transmit the personal data and order data of the Users recorded during registration or ordering to KBOSS.hu Kft. (1031 Budapest, Záhony utca 7.; tax number: 13421739-2-41; Cg.01-09-303201), the operator of the *szamlazz.hu* website, for the purpose of electronic invoicing of the ordered products or services and storage of the invoices. The personal data transmitted in this way will be processed in accordance with the data management information of KBOSS.hu Kft. (available at the link: <https://www.szamlazz.hu/adatvedelem/>).

Storage period for personal data: the obligation to keep accounting records is fulfilled for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.

In relation to our processing of your personal data in connection with the payment for the goods or services, you have the right to object to the processing of your personal data.

- for information,
- to access,
- for the correction,
- to delete,

- to the restriction,
- for data storage,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Meeting accounting obligations

Purpose of data processing: Pursuant to Article 169 (2) of Act C of 2000 on Accounting, the Data Controller is obliged to keep the supporting documents for the accounting for 8 years in a legible and retrievable form.

Data subject: a person who has received a product or service from the Data Controller.

Data: first and last name, address, sole trader registration number, tax number, order ID, product and service details, payment method.

Legal basis for processing: Based on Article 6(1)(c) of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR), to comply with a legal obligation to which the Data Controller is subject.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Recipients and categories of recipients of personal data

Data processed during the contracting, invoicing and payment process are transmitted by the Data Controller to the accounting company, the account management bank and the company providing the online invoice, the online payment system provider and the NAV.

Storage period of personal data: the obligation to keep accounting records is fulfilled for 8 years pursuant to Section 169 (2) of Act C of 2000 on Accounting.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our processing of your personal data for our accounting obligations, you have the right to object to our processing of your personal data.

- for information,
- to access,
- for correction,
- to limit,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

Complaints handling

Purpose of processing: handling complaints about any of the services provided by the Data Controller, recording and storing records in the course of handling warranty and guarantee claims, issuing and storing a receipt for the product received for repair or to check the eligibility of the warranty/guarantee claim, returning the product for repair or replacement from the customer to the Data Controller's warehouse, and then redelivering the replaced/repaired product.

Data Subject: persons who make a complaint or a warranty or guarantee claim to the Data Controller in relation to any of the services/products provided by the Data Controller, either in person, by telephone, by e-mail or by using the contact form.

Data scope: order number, name, address, e-mail address, telephone number of the customer, name of the product, purchase price, date of purchase and date of complaint, data necessary for the investigation of the complaint in the description of the complaint, personal data voluntarily provided by the customer, signature of the person who registered the complaint and of the person who lodged the complaint, personal data used in the investigation of the complaint and personal data contained in the response to the complaint.

Legal basis for data processing: article 6 (1) (c) GDPR; in accordance with § 17/A (3)-(5) of the GDPR and § 4 (1) (a) and (6) and § 6 (1) (a) of the NGM Decree 19/2014 (IV. 29.) on the procedural rules for handling warranty and guarantee claims for goods sold under a contract between a consumer and a business.

The source of the personal data and the scope of the data processed, if not provided by the data subject to the Controller

The Controller does not process personal data that it does not collect from the data subject.

Recipients or categories of recipients of personal data: the territorially competent government agency.

The period of storage of personal data

3 years from the date of recording the minutes pursuant to Section 17/A (7) of the Consumer Protection Act, and the three-year retention period from the date of recording the minutes pursuant to Section 4 (6) of Decree 19/2014 (29.IV.) of the National Administrative Procedure Act.

Method of data storage: in the Data Controller's physically protected office premises and archives on paper and electronically in its document management system, accessible to persons with appropriate access rights in accordance with internal rules.

In relation to our processing of your personal data for complaint handling, you have the right to object to the processing of your personal data.

- for information,
- to access,
- for correction,
- to limit,
- and to exercise your right of redress.

You will find a description of the content of the data subjects' rights in point 4 of this notice.

4. Description of data subjects' rights in relation to data processing

4.1 The right to transparent information

The Data Controller hereby fulfils its obligation to inform the Data Controller, the Data Protection Officer, the purposes and legal basis of the processing, the duration of the processing, the source of the data, the rights of the data subject and the remedies.

4.2. Right of access

The data subject shall have the right to obtain from the Controller, through the contact details provided in point 1, information as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to be informed that:

- what personal data of the Data Controller;
- on what legal basis;
- for what purpose;
- for how long; and
- to whom, when, under what law, to which personal data the Data Controller has given access or to whom the Data Controller has transferred the personal data;
- the source of your personal data;
- whether the Data Controller uses automated decision-making and its logic, including profiling.

The Data Controller shall provide a copy of the personal data subject to the processing free of charge for the first time upon the data subject's request, and may charge a reasonable fee based on administrative costs thereafter. In order to ensure data security and to protect the rights of the data subject, the Data Controller shall verify the identity of the data subject and of the person who wishes to exercise the right of access, and to this end, the provision of information, access to or copying of the data shall be subject to the identification of the data subject.

The Data Controller will consider a request sent by letter as authentic if the data subject can be clearly identified on the basis of the request sent. A request for information sent by e-mail shall be considered authentic by the Data Controller only if it is sent from the e-mail address of the data subject, but this does not preclude the Data Controller from identifying the data subject in another way before providing the information. In order to comply with the request, the Data Controller shall verify that the person entitled to exercise the rights of the data subject is the person who intends to exercise those rights. For this purpose, it may be necessary, where justified, for the data subject to appear in person at the controller's headquarters for identification purposes.

4.3. Right to rectification

The data subject shall have the right to obtain from the Data Controller, upon his or her request and without undue delay, the rectification of inaccurate or incomplete personal data relating to him or her. Having regard to the purposes of the processing, the data subject shall have the right to obtain the rectification of incomplete personal data, including by means of a supplementary declaration.

If you or the Data Controller becomes aware that personal data it is processing is inaccurate, erroneous or otherwise incomplete, either at your request or through the Data Controller's own action, the Data Controller will correct the incomplete or erroneous data.

The data subject may request that the Controller amend any of his or her personal data by using the contact details provided in point 3.10. If the data subject can credibly demonstrate the accuracy of the corrected data, the Controller shall comply with the request within a maximum of one month and shall notify the data subject thereof using the contact details provided by the data subject.

4.4. Right to restriction of processing

You may at any time request that the processing of some or all of the data you have provided to the Data Controller be restricted. The Data Controller will not erase the data in the event of your request for erasure, but will block the data if such erasure would harm your legitimate

interests. The Data Controller will only process the blocked data for as long as the purpose for which the blocking was requested persists, after which the blocked data will also be deleted.

The data subject may request, through the contact details provided in point 3.10, that the Controller restricts the processing of his or her personal data (by clearly indicating the restriction of processing and ensuring that it is kept separate from other data) where.

- contests the accuracy of your personal data (in which case the Controller will limit the processing for the period for which it verifies the accuracy of the personal data);
- the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- the data subject has objected to the processing (in which case the restriction applies for the period until it is established whether the legitimate grounds of the Controller prevail over the legitimate grounds of the data subject).

4.5. Right to object to processing

The data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of legitimate interest. In such a case, the Controller may no longer process the personal data, unless the Controller 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.

4.6 Right to erasure - "the right to be forgotten"

Personal data must be deleted if.

1. the purpose of the processing has ceased,
2. the data subject has withdrawn his or her consent and there is no other legal basis for the processing,
3. the processing is based on a legitimate interest or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and the data subject objects to the processing,
4. the processing is unlawful,
5. the personal data must be erased in order to comply with a legal obligation under Union or Member State law applicable to the Data Controller,
6. the data were deleted in relation to information society services offered directly to children.

The Data Controller is not obliged to delete data at the request of the data subject if one of the exceptions listed below applies. Personal data relating to the data subject shall not be erased if the processing is necessary

1. to exercise the right to freedom of expression and information,
2. to comply with an obligation under Union or national law to which the Data Controller is subject or to carry out a task carried out in the public interest or in the exercise of official authority,
3. in the public interest in the field of public health,
4. for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes, where the right of erasure would be likely to render such processing impossible or seriously jeopardise it,
5. to bring, enforce or defend legal claims.

You may request the permanent and irretrievable deletion of your personal data at any time if the Controller processes your data on the basis of your consent. In the case of processing by the Controller or in your legitimate interest and in order to comply with mandatory legal storage and retention obligations, the Controller cannot erase your data. The Controller shall delete the personal data at the same time as the purpose of the processing ceases to exist. The Data Controller shall also delete the data if it is established that the processing of the data is unlawful for any reason, or if the deletion of the data is ordered by a public authority or a court.

In relation to the processing described in this notice, the data subject may exercise his or her right to erasure only if the data are no longer necessary for the performance of the processing task.

4.7. The right to data portability

The data subject shall have the right to receive personal data relating to him or her which he or she has provided to a Data Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another Data Controller without hindrance from the Data Controller to which he or she has provided the personal data, where the processing is based on consent or a contract and the processing is automated.

In exercising the right to data portability, the data subject has the right to request, where technically feasible, the direct transfer of personal data between Data Controllers. The exercise of this right shall be without prejudice to the right to be forgotten.

The right to data portability applies only to personal data that the Data Controller processes about you in an automated form and on the basis of your consent.

4.8. Withdrawal of consent

You have the right at any time to withdraw your consent to the processing of your personal data without giving any reason. The Data Controller will consider the withdrawal of consent sent by letter as authentic if the data subject can be clearly identified on the basis of the request sent. A withdrawal of consent sent by e-mail shall be considered authentic by the Data Controller only if it is sent from the e-mail address of the data subject, but this shall not preclude the Data Controller from identifying the data subject in another way before providing the information.

The withdrawal of consent shall not affect the lawfulness of the processing carried out by the Controller on the basis of the consent prior to its withdrawal.

4.9 Right of the data subject in the event of automated decision-making

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. This provision shall not apply in the following cases:

1. necessary for the conclusion or performance of a contract between the data subject and the controller,
2. is permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject, or,
3. is based on the explicit consent of the data subject.

The Controller shall ensure that the data subject has at least the right to obtain human intervention by the Controller, to express his or her views and to object to the decision.

In order to comply with the request, the Data Controller must ensure that the person entitled to exercise the data subject's rights is the person who intends to exercise them. For this purpose, it

may be necessary, where justified, for the data subject to appear in person at the premises of the controller for identification purposes.

4.10. How can you exercise your rights to your personal data?

The Data Controller shall carry out its tasks in relation to the exercise of the rights of the data subject within 30 days of receipt of your request, or within 15 days in the event of an objection.

Where justified by the complexity of the request or other objective circumstances, the above deadline may be extended once, up to a maximum of 60 days. The Data Controller shall notify the data subject in writing of the extension of the time limit, together with the reasons for the extension.

The Data Controller shall provide the information free of charge, unless:

- a) the data subject repeatedly requests information and action on substantially unchanged content;
- b) the application is manifestly unfounded;
- c) the request is excessive.

(4) In the cases referred to in the previous paragraph, the Controller shall be entitled to:

- a) refuse the request;
- b) to make the execution of the request subject to the payment of a reasonable fee.

If the applicant requests the data to be provided on paper or on an electronic storage medium (CD or DVD), the Data Controller will provide a copy of the data concerned free of charge in the requested format (unless the chosen platform would present a disproportionate technical difficulty). For each additional copy requested, an administration fee of HUF 500 per page or CD-DVD will be charged.

The Data Controller shall notify any rectification, erasure or restriction carried out by it to all persons to whom the data concerned were previously disclosed, unless such notification is impossible or involves a disproportionate effort.

Within 5 years after the death of the data subject, the rights of access, rectification, erasure, restriction of processing or objection may be exercised by the person authorised by the data subject by administrative order or by a declaration made in a public/private document having full probative value made to the Controller. In the absence of such authorisation, the rights of rectification and objection and, where the processing was unlawful during the lifetime of the data subject or the purpose of the processing ceased to exist upon the death of the data subject, the rights of erasure and restriction of processing may also be exercised by a close relative (spouse, relative in the direct line of marriage, brother or sister) of the data subject.

The person asserting the rights must prove to the Data Controller the fact of the death of the data subject, his or her identity and the capacity of close relative.

4.11. Summary table on the enforceability of data subjects' rights

right of access Name	a) Contribution	b) Contract	c) legal Commitment	f) legitimate interest
information Articles 13-14	yes	yes	yes	yes
Access Article 15	yes	yes	yes	yes

Corrigendum Article 16	yes	yes	yes	yes
deletion Article 17	yes	yes	not	not
restriction Article 18	yes	yes	yes	yes
protest Article 21	not	not	not	yes
data portability Article 20	yes, if automated	yes, if automated	not	not
right to object to automatic decision-making Article 22(3)	not	not	not	yes
right to a remedy Articles 77-79	yes	yes	yes	yes

5. Access to redress - options available on average

5.1. Submitting a complaint to the Data Controller

If you have a problem with the Data Controller's processing of your data, you may contact the Data Controller directly with your complaint using the contact details in section 1.

5.2. Investigation by the National Authority for Data Protection and Freedom of Information

Anyone may lodge a complaint with the National Authority for Data Protection and Freedom of Information (hereinafter referred to as the Authority) to initiate an investigation on the grounds that a violation of rights has occurred or is imminent in relation to the processing of personal data. If the data subject disagrees with the decision taken by the Controller, he or she may lodge a complaint with the National Authority for Data Protection and Freedom of Information against any infringement of the law by the Controller.

National Authority for Data Protection and Freedom of Information

1055 Budapest Falk Miksa u. 9-11.

Postal address: 1363 Budapest, Postafiók 9.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: www.naih.hu

5.3. Judicial enforcement

The data subject may take the Data Controller to court in the event of a breach of his or her rights. Proceedings against the Controller or the processor shall be brought before the courts of the Member State in which the Controller or the processor is established. Proceedings may also be brought before the courts of the Member State in which the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in its exercise of official authority. In Hungary, the action may also be brought, at the choice of the data subject, before the courts for the place where he or she resides or is domiciled. The data subject may claim damages/compensation from the controller in the action:

- a) if the Data Controller causes damage to another party by unlawful processing of the data subject's data or by breaching the requirements of data security, the Data Controller shall compensate the damage,

b) if the Data Controller infringes the data subject's right to privacy by unlawfully processing his or her data or by breaching data security requirements, the data subject may claim damages from the Data Controller.

6. Processors appointed by the Data Controller

The Data Controller uses the data processors listed in the table below to perform the technical tasks related to the data processing operations. The rights and obligations of the data processor in relation to the processing of personal data shall be determined by the Data Controller within the framework of the GDPR and the specific laws applicable to data processing. The Controller is responsible for the lawfulness of the instructions given by it.

The processor may not make any decision on the substance of the processing, may process the personal data that come to his/her knowledge only in accordance with the provisions of the Controller, may not process the data for his/her own purposes, and shall store and retain the personal data in accordance with the provisions of the Controller.

7. Data security Description of the measures taken in relation to gal

The Data Controller and its contractual partners involved in the processing of personal data shall select and operate the IT tools used for the processing of personal data in such a way that the processed data:

- accessible to authorised persons (availability);
 - authenticity and verification (authenticity of processing);
 - can be verified to be unchanged (data integrity);
 - protected against unauthorised access (data confidentiality)
- should be.

The Data Controller shall ensure the security of the data, take the technical and organisational measures and establish the procedural rules necessary to enforce the applicable laws, data protection and confidentiality rules. The Data Controller shall take appropriate measures to protect the data against unauthorised access, alteration, disclosure, disclosure, erasure or destruction, accidental destruction or damage and against inaccessibility resulting from changes in the technology used.

The Data Controller and the processors shall implement appropriate technical and organisational measures to ensure a level of data security appropriate to the scale of the risk, taking into account the state of science and technology and the cost of implementation, the nature, scope, context and purposes of the processing, and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons. The Data Controller shall, in the context of the above:

- ensure that measures are in place to protect against unauthorised access, including the protection of software and hardware devices and physical protection (access protection, network protection);
- take measures to ensure that data files can be restored, and ensure regular backups;
- takes measures to protect against viruses.

The Data Controller informs you that electronic messages transmitted on the Internet, regardless of the protocol (e-mail, web, ftp, etc.), are vulnerable to network threats that could lead to fraudulent activity or to the disclosure or modification of information. However, the Data Controller will take all reasonable precautions to prevent these. It will monitor the systems in order to record and provide evidence of any security discrepancies in the event of a security incident. The Data Controller shall also monitor the effectiveness of the precautions taken by monitoring the systems.

8. Our procedures in the event of a data breach

If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall inform the data subject of the personal data breach without undue delay.

The information provided to the data subject shall clearly and prominently describe the nature of the personal data breach and provide the name and contact details of the Data Protection Officer or other contact person who can provide further information; describe the likely consequences of the personal data breach; describe the measures taken or envisaged by the Data Controller to remedy the personal data breach, including, where appropriate, measures to mitigate any adverse consequences of the personal data breach.

The data subject need not be informed if any of the following conditions are met:

1. the Data Controller has implemented appropriate technical and organisational protection measures and these measures have been applied to the data affected by the personal data breach, in particular measures such as the use of encryption, which render the data unintelligible to persons not authorised to access the personal data;
2. the controller has taken additional measures following the personal data breach to ensure that the high risk to the rights and freedoms of the data subject is no longer likely to materialise;
3. information would require a disproportionate effort. In such cases, the data subjects should be informed by means of publicly disclosed information or by a similar measure which ensures that the data subjects are informed in an equally effective manner.

If the controller has not yet notified the data subject of the personal data breach, the supervisory authority may, after having considered whether the personal data breach is likely to present a high risk, order the data subject to be informed.

Data breaches can be reported online using the following interface:

<https://naih.hu/adatvedelmi-incidensbejelent-rendszer.html>

9. Automated decision-making and profiling

The Data Controller does not perform any automated decision-making or profiling in relation to its customers and partners. The data obtained through customer satisfaction surveys are processed in an anonymised form, based on legitimate interest, solely for the purpose of statistical and business policy decisions.

10. Data processing of children

The consent may be given by the legal representative on behalf of a minor under the age of 14 and of a person who is otherwise incapacitated. A minor aged 14 or over but under 16 and a data subject who is otherwise incapacitated may give consent to the processing with the consent or the subsequent consent of his or her legal representative. A data subject who is a minor aged 16 or over may give consent on his or her own initiative, without the need for the consent or subsequent consent of his or her legal representative. Where the controller is not in a position to verify the eligibility of the person giving consent or to know the content of the legal representative's statement, the data subject or his or her legal representative shall ensure that the consent is in accordance with the law. The data controller shall consider the consent of the legal representative to be duly given when using the service.

11. Annexes

Annex 1 - Definitions

Annex 2 - Applicable legislation

Annex 3 - Details of the data processors used

Effective from 15.10.2024.

Annex 1 - Definitions

"personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, 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 upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, 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 a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;

"Data Controller under the Prospectus" means the Data Controller

"data processor" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the Controller;

"recipient" means a natural or legal person, public authority, agency or any other body to whom or with which personal data is disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of those data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;

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

"the data subject's consent" means a freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;

"restriction of processing" means the marking of stored personal data for the purpose of restricting their future processing;

"profiling" means any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

"pseudonymisation" means the processing of personal data in such a way that it is no longer possible to identify the natural person to whom the personal data relate without further information, provided that such further information is kept separately and technical and organisational measures are taken to ensure that no natural person who is identified or identifiable can be linked to that personal data;

"filing system" means a set of personal data, structured in any way, whether centralised, decentralised or structured according to functional or geographical criteria, which is accessible on the basis of specified criteria;

"data breach" means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

'biometric data' means any personal data relating to the physical, physiological or behavioural characteristics of a natural person obtained by means of specific technical procedures which allow or confirm the unique identification of a natural person, such as facial image or dactyloscopic data;

"health data" means personal data relating to the physical or mental health of a natural person, including data relating to the provision of health services to a natural person which contains information about the health of the natural person;

"enterprise" means any natural or legal person carrying on an economic activity, regardless of its legal form, including partnerships or associations carrying on a regular economic activity;

"supervisory authority" means an independent public authority established by a Member State in accordance with Article 51, in Hungary the National Authority for Data Protection and Freedom of Information

Annex 2 - Applicable legislation

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation) (GDPR) (27 April 2016)

Act CXII of 2011 - on the Right to Informational Self-Determination and Freedom of Information (hereinafter: Infotv.)

Act CVIII of 2001 - on certain aspects of electronic commerce services and information society services (in particular § 13/A)

Act XLVII of 2008 - on the prohibition of unfair commercial practices against consumers;

Act XLVIII of 2008 - on the basic conditions and certain restrictions of economic advertising (in particular § 6)

Act XC of 2005 on Electronic Freedom of Information

Act C of 2003 on Electronic Communications

Act LIII of 2017 - on the Prevention and Combating of Money Laundering and Terrorist Financing (Pmt.);

Act CLV of 1997 on Consumer Protection;

Opinion 16/2011 on EASA/IAB Recommendation on best practice for behavioural online advertising

Recommendation of the National Authority for Data Protection and Freedom of Information on the data protection requirements for prior information.

4. Annex 3.1 - Data of the data processors used

Type of data processor	Company name:	Headquarters:
Accounting/Payroll accounting	Papírfarm Kft	1162 Budapest Állás u. 18.
Storage service provider	Devbox	7054 Tengelic, Rákóczi Ferenc u. 9.