

Data Protection Information of T.E.L.L. Rendszerszolgáltatások Kft.

The following information is provided to the visitors of our website with regard to our personal data processing practices, the technical and organizational measures we take to ensure the protection of their data, their related rights, and their possibilities of exercising those rights.

- **Controller:**
T.E.L.L. Rendszerszolgáltatások Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság
(registered seat: 4034 Debrecen, Vágóhíd utca 2.; company registration number: 09-09-022041; court of registration: Debreceni Törvényszék; tax number: 23582196-2-09; phone: +36-1-8000-111, fax: +36-52/530-131, e-mail: ajanlatkeres@tell.hu, web page: info.easytrack.hu, hereinafter collectively as: Company) as controller.

- **Processing the data of the visitors to the Company website**

Information on the use of cookies

Following a common Internet practice, our Company uses cookies on its website as well. Cookies are small files containing a line of characters which are saved on the visitor's computer when they visit a website. Should they visit the site again, the cookies enable the website to be able to recognize the visitor's browser. Cookies can store user settings (e. g. selected language) and other information, as well. Among other things, they can collect information about the visitor and their device, they remember the individual settings of the visitor, they may be used for example during online purchases. Cookies in general ensure that the website can be used more easily, they enable users to have a true web experience, and that the website can become an effective source of information, furthermore, they enable the operator of the website to monitor the operation of the website, to prevent abuse and to continue providing uninterrupted services at a satisfactory level.

The following data is collected and processed during the use of the webpage by our Company website regarding the visitor and the device they use for browsing:

- IP address,
- Browser type/version,
- Type/version of operating system
- Last activity
- Language
- Login ID
- "token" generated for login
- Profile ID
- Profile username
- Profile language

From these data the system automatically generates statistical data. The operator does not link these data with personal data.

It is not compulsory to accept and allow the use of cookies. You may reset your browser in a way that it bans all the cookies or that it warns if the system is sending a cookie. Although most browsers automatically accept cookies by default, these may be changed to prevent automatic acceptance and so that it would offer a choice every time.

You can find more information on the cookie settings of the most popular browsers in the [links](#) below:

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=hu>
- Firefox: <https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>
- Microsoft Internet Explorer 11: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-11>
- Microsoft Internet Explorer 10: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-10-win-7>
- Microsoft Internet Explorer 9: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-9>
- Microsoft Internet Explorer 8: <http://windows.microsoft.com/hu-hu/internet-explorer/delete-manage-cookies#ie=ie-8>
- Microsoft Edge: <http://windows.microsoft.com/hu-hu/windows-10/edge-privacy-faq>
- Safari: <https://support.apple.com/hu-hu/HT201265>

However, please be advised that some of the functions of the website or some of the services offered may not function properly without cookies.

The cookies used on the website are not suitable to enable the identification of the user on their own.

The cookies used on the Company website:

1. **Session cookies** that are technically indispensable.

These cookies are necessary to enable visitors to browse the website, use all the functions and the services accessible through the website in a fault free manner, therefore – among others – specially to remember the operations carried out at the last visit on the specific webpage. Data processing period of these cookies is 2 hours.

Processed data:

- Language displayed
- Internal identifier of the currency
- User's address
- Selected mode of delivery and payment
- VAT rate
- Coupon details
- Current country
- Contents of the shopping cart
- Whether the user can make a purchase
- Internal identifier of the user
- Requests for quotation
- User's name

The legal basis of this data processing is Section 13/A. (3) of Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Elkertv.).

Purpose of data processing: to ensure the appropriate operation of the website.

2. Cookies requiring consent:

These enable the Company to remember the choices the user made in connection with the website. Prior to using the service and during the use of the service users can ban this data processing at any time. These data cannot be linked to the personal data of the user and may not be transferred to third parties without the permission of the user.

Duration of processing: 1 day

2.1. Cookies necessary to facilitate functioning:

The legal basis of the processing is the consent of the visitor.

Purpose of data processing: To increase the efficiency of the service, to improve user experience, to make the use of the website more convenient.

Duration of processing: 2 hours

2.2. Performance cookies:

Google Analytics cookies – find more information here:

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

Google AdWords cookies - find more information here:

<https://support.google.com/adwords/answer/2407785?hl=hu>

The Company hereby informs the visitors of its website on the use of the following programs to measure the usage of the website info.easytrack.hu and its subpages, to monitor the behavior of its visitors, to create statistics, as well as for the efficiency of its advertisements:

- Google Analytics,
- Google AdWords Conversion Tracking,
- Hotjar and
- Facebook Remarketing.

The referenced programs place so called cookies on the user's computer for collecting user data. By visiting the website, you give your consent to the Company for the use of the following programs: Google Analytics, AdWords Conversion Tracking, as well as Facebook Remarketing, and Hotjar. At the same time, you give your consent to the monitoring and tracking of your user behavior, as well as to the usage of all services provided by the programs. In addition, the user can block the data collection and storage by cookies for the future any time as described below.

We inform our visitors that the settings and the use of the programs Google Analytics, AdWords Conversion Tracking, as well as Facebook Remarketing and Hotjar fully meet the requirements of the Data Protection Authority.

According to the information provided by Google, Google Analytics reports visitor interactions on its website principally with first-party cookies. These cookies record only information that are not suitable for identification. The browsers do not share their own cookies among the domains. For more information on cookies please read the Google Ads and Privacy Policy FAQs.

Google Analytics: The Data Controller uses the program Google Analytics principally to create statistics, measures the efficiency of its campaigns, among others. By using the program, the Company gains information chiefly about the number of visitors of the website and about the time they spent on the website. The program recognizes the visitor's IP address that allows it to track whether the visitor is a returning or a new visitor. Furthermore, it allows the tracking the visitor's route on the website.

Google AdWords Conversion Tracking: The aim of Google AdWords Conversion Tracking is to allow the Company to measure the efficiency of AdWords ads. It places cookies on the Visitor's computer to this end. These cookies exist 30 days long and they collect no personal data.

Disable cookies: You can edit your cookie settings or disable the cookie function in your own browser. This option can be found – depending on the toolbar of the browser – in cookies/cookies/placing tracking functions. In general, you can set the tracking functions to allow/disable on your computer under Devices > Settings > Privacy settings. If you do not want Google Analytics to report your visits, you can install a browser extension to block Google Analytics. This extension instructs the JavaScripts of Google Analytics, not to send information on visits to Google. In case you install the blocking extension, you will not even participate in content experiments. If you wish to disable the web activity of Google, search for the Google Analytics blocking page and install the extension to your browser. For more information on installing and removing the extension, visit the Support Center of the given browser.

Besides Google services, the Company uses the analysis tool of Hotjar, too: Hotjar Ltd. („Hotjar“) (<http://www.hotjar.com>, 3 Lyons Range, 20 Bisazza Street, Sliema SLM 1640, Malta, Europe). By means of Hotjar analysis, the Company can get to know and evaluate Users'

habits on the website (e. g. how much time they spend on a particular subpage, the links they click on etc.). During the operation of the function, the data collected on visits of the website are forwarded to Hotjar servers located in Ireland where they are stored by Hotjar.

Following information can be recorded with the visitor's device and browser:

- IP address of user's device (collected and stored anonymously)
- Display size of user's device
- Type of user's device and type of the browser used by them
- The user's place of residence (the country only)

Visits on the website and its usage are analyzed by Hotjar, and a separate report is created. During the functioning of this feature, Hotjar uses third-party services, e. g. Google Analytics and Optimizely, too. Though data forwarding, third parties can store the information sent by the user's browser while visiting the website (e.g., cookies, IP requests etc.). Cookies used by Hotjar are deleted after different periods of time, certain cookies are deleted after the current visit automatically, however, there are cookies that exist for up to 365 days.

In case you wish to block the logging by Hotjar, please visit the following website: <https://www.hotjar.com/opt-out>.

The Privacy Policy of Hotjar can be found here (<https://www.hotjar.com/legal/policies/privacy>).

The Company applies the so-called "Facebook pixel" of the social network Facebook run by Facebook Inc. (1 Hacker Way, Menlo Park, CA 94025, USA), or in case you live in the EU, by Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) („Facebook“). Thanks to the Facebook pixel, Facebook can manage the visitors of the website as a target group when displaying advertisements (so-called Facebook Ads). In accordance with this, the Company uses the Facebook pixel to display the Facebook advertisements embedded by them only to those Facebook users who showed interest in the offers of the Company, too. This means, the Facebook pixel aims to adjust Facebook advertisements to the potential interests of the users so that they do not appear as annoying factors. Furthermore, the Company can analyze the efficiency of advertisements displayed on Facebook with the Facebook pixel for statistical and market research purposes, e.g. whether the users got to our website by clicking on the Facebook advertisement. The Facebook pixel is embedded directly by Facebook when opening our website. This can place a so-called cookie, a tiny file on the user's device. If you login to Facebook later or if you visit the sites of Facebook already logged-in, your visit on the website will be registered in your profile. The data gained from visitors are anonymous, which means, based on this, their identity cannot be uncovered. However, the data are stored and processed by Facebook, allowing them to link the data to the given user profile. Facebook processes data in accordance with its own data processing policy. And so, for more information on the functioning of remarketing pixels and on displaying Facebook advertisements in general, please visit the Facebook Data Processing Policy at the following address: <https://www.facebook.com/policy.php>. You can block the data recording by the Facebook pixel, as well as the use of your data to display Facebook advertisements. To do this, open the site created by Facebook and follow the instructions in connection with the settings of personalized advertisements: <https://www.facebook.com/settings?tab=ads>, URL in the US: <http://www.aboutads.info/choices/>, URL in the EU: <http://www.youronlinechoices.com/>. Then settings are platform independent, which means, they relate to both personal computers and mobile devices.

- **Data processing related to the newsletter service**

Scope of personal data that can be processed: name of natural person (first and last name), e-mail address.

The purpose of processing the personal data:

1. Sending newsletters about the products and services of the Company

2. Sending advertising material
3. Communication regarding technical information (updates, new functions, patches)

Legal basis of the processing: the consent of the data subject.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service and its marketing activities, employees of the IT provider of the Company as data processors with the purpose of providing the hosting service.

Storage period of personal data: if the newsletter service is provided, or until data subject withdraws his or her consent (until his or her request for erasure, which can be sent to the e-mail address easytrackinfo@tell.hu).

- **Data processing in connection with the use of the trial version**

To introduce its service, the Company provides an opportunity to test the service on the website. The natural person who subscribes to the service can give consent to processing their personal data by clicking on the button „Try now” after ticking the box related to the consent to data processing.

Scope of personal data that can be processed: name of natural person (first and last name), e-mail address.

The purpose of processing the personal data:

1. Facilitating the testing of the service

Legal basis of the processing: the consent of the data subject.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service, employees of the IT provider of the Company as data processors with the purpose of providing the hosting service.

Storage period of personal data: until the duration of the trial service, or until data subject withdraws his or her consent (until his or her request for erasure, which can be sent to the e-mail address easytrackinfo@tell.hu).

- **Recording the telephone conversations of the customer service**

The Company records the telephone conversations made with its customer service with the purpose of conducting sales, providing services and with the purpose of providing information about them. Legal basis of the processing is the consent of the data subject.

Notification must be given that a recording will be made, and the consent must be gained at the beginning of the call.

The following data are collected when phone conversations are recorded: phone number, date and time of the call, recording of the conversation, personal data provided during the conversation.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service.

Telephone conversations are stored for 1 year. The recorded material can be searched using the telephone number and the date of the call.

- **Community guidelines / Data processing on the Facebook page of the Company**

The Company maintains a Facebook page in order to raise awareness of and to promote its products and services.

Questions submitted on the Facebook page of the Company do not constitute an official complaint.

The Company does not process the personal data that the visitors of the Facebook page of the Company reveal.

Data protection and General terms and conditions of Facebook apply to visitors.

In the event that unlawful or offensive content is posted, the Company may, without prior notification, ban data subject from the members, or delete their posts.

The Company does not accept any responsibility whatsoever for data content or posts published by Facebook users that are in breach of legislation. The Company does not accept any responsibility whatsoever for errors, malfunctions resulting from the operation of Facebook, or for issues resulting from a change in the functioning of the system.

- **Data processing with the purpose of direct marketing**

Unless regulated otherwise by law, advertisements can only be sent to natural person recipients of an advertisement directly (direct marketing), especially by way of electronic correspondence or other, equivalent individual means of communication – with the exceptions set forth in Act XLVIII of 2008 – if the recipient of the advertisement has provided his or her prior, explicit, and unequivocal consent.

Scope of the personal data that the Company may use for direct marketing purposes: name, address, phone number, e-mail address, online identifier of the natural person.

The purpose of processing the personal data is to carry out direct marketing activities related to the operation of the Company, i. e. the sending of advertising publications, newsletters, current promotions in printed form (by post) or by an electronic means (e-mail) on a regular basis or at intervals to the contact details provided at registration.

Legal basis of processing: the consent of the data subject.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service, employees of the IT provider of the Company as data processors with the purpose of providing the hosting service, in case of postal delivery, employees of the Post Office.

Storage period of personal data: until consent is withdrawn.

- **Processing the data of contracting partners**

Under the legal title of performing a contract, the Company processes the name, birth name, date of birth, mother's name, address, tax identification number, phone number, e-mail address, bank account number, client number (customer number, order number), online identifier (list of buyers and suppliers, customer loyalty lists) of the natural persons that enter into a contract with the Company as clients or suppliers, with the purpose of concluding,

performing, terminating the contract or an order to provide contractual discounts. This data processing is lawful even if it is necessary for the implementation of the measures that data subject requested prior to entering into contract. Recipient of personal data: employees of the Company performing tasks related to serving customers, its employees performing accounting and taxation-related tasks, and its data processors. The duration of personal data processing: 5 years after the agreement terminated.

Data subject must be notified that the legal basis of the processing is the performing of the contract, this notification may be made in the agreement, as well.

Data subject must be notified that his or her personal data are forwarded to the data processor.

- **Contact details of natural persons who represent legal entities as clients, buyers, suppliers**

Scope of the processed personal data: name, address, phone number, e-mail address of the natural person.

The purpose of processing the personal data: performing the contract the Company entered into with its partner who is a legal entity, maintaining business contact. Service Provider processes the personal data in accordance with Article 6 section (1) point f) of GDPR and the legal basis is its legitimate interest in establishing and maintaining business relations.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service.

Personal data are stored for five years after the business relation existed, or after the data subject acted as point of contact.

- **Data processing while performing tasks related to customer service**

Scope of the processed personal data: name, address, phone number, e-mail address of the natural person, error detection log, containing the full communication between the device and the software.

The purpose of processing the personal data: performing the contract the Company entered into with its partner, performing tasks related to customer service, troubleshooting. Legal basis of processing is the performing of the contract.

Recipient of personal data, and categories of recipients: employees of the Company performing tasks related to its customer service.

Storage period of personal data: until tasks related to customer service are performed, time of troubleshooting, after which data are deleted without delay.

- **Data processing related to the use of the Driver App mobile application**

In order to use the service, the user shall provide some of their personal data to the Company. These data are processed confidentially, used for the sole purpose of providing the given

service, ensuring the functionality of the application, by ensuring complete regulatory compliance.

Downloading and using the app, as well as providing personal data shall be voluntary in any case.

Data subject assumes responsibility for carrying out the product download voluntarily and in the possession of appropriate information. The person who has provided the data takes sole responsibility for the appropriateness of that data. With regard to this responsibility, the Company does not bear any responsibility for any untruth of the provided data.

Purpose of data processing: the use of the services of the Driver App mobile application by the User.

Legal basis of data processing: Section 13(a)(3) of Act CVIII of 2001 on Electronic Commerce and on Information Society Services.

Scope of personal data that can be processed:

- username and password, facilitating driver identification,
- pictures uploaded in the document library by the data subject,
- contents of conversations between drivers and dispatchers,
- data of the user's computer and mobile devices that are generated while using the service and that are recorded by the system of the Company as an automatic result of technical processes.

Storage location of processed data: on the own servers of the Provider in the server hotel of Servergarden Kft. located at H-1023 Budapest, Lajos utca 28-32., as well as in the storage space of the mobile application.

Duration of data processing: data are processed by the Provider during the registration of the driver.

Access to data: besides the user, only employees of the Company have access to the processed personal data to the extent necessary for running the application and the service.

INFORMATION SUMMARY ON THE RIGHTS OF DATA SUBJECTS

In this chapter, to provide transparency and ensure unambiguity, we will summarize the rights of the data subject, and the next chapter will contain detailed information on how to exercise them.

Right to preliminary notification

Data subject has the right to receive information on the facts and information related to processing prior to the beginning of the processing.
(Regulation Art. 13-14)

Data processing can only begin after the information has been provided. If the legal basis of the processing is consent, the data subject must provide his or her consent in addition to the information provided.

Detailed rules are included in the next chapter.

Data subject's right to access

The data subject shall have the right to obtain confirmation from the controller as to whether, or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information determined in the Regulation.

(Regulation Art. 15).

Detailed rules are included in the next chapter.

Right to rectification

Data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Having regard to the purpose of the processing, data subject has the right to request the incomplete personal data to be completed, among others, by way of a supplementary declaration.

(Regulation Art. 16)

Right to erasure („the right to be forgotten”)

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, and controller shall be obliged to erase the personal data concerning the data subject without undue delay, where one of the grounds set forth in the Regulation applies.

(Regulation Art. 17)

Detailed rules are included in the next chapter.

Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where the grounds set forth in the Regulation apply.

(Regulation Art. 18)

Detailed rules are included in the next chapter.

Obligation to notify in case of the rectification, erasure of the personal data or the restriction of processing

Controller shall notify every recipient to whom the personal data have been revealed of every rectification, erasure, or restriction of processing, except where this proves impossible or would require disproportionate efforts. Controller shall inform the data subject about those recipients should the data subject request it.

(Regulation Art. 19)

Right to data portability

Subject to the conditions set forth in the Regulation, the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used, and machine-readable format; and furthermore, he or she has the right to have those data transferred to another Controller without this process being hindered by the Controller to whom he or she has provided such personal data.

(Regulation Art. 20)

Detailed rules are included in the next chapter.

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of his or her personal data which is based on point e) of Article 6(1) of the Regulation (processing 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) or on point f) Art 6(1) (processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party).

(Regulation Art. 21)

Detailed rules are included in the next chapter.

Automated individual decision-making, including profiling

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.

(Regulation Art. 22)

Detailed rules are included in the next chapter.

Restrictions

Union or Member State law to which the Controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided for in Articles 12 to 22, in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22.

(Regulation Art. 23)

Detailed rules are included in the next chapter.

Communication of a personal data breach to the data subject

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

(Regulation Art. 34)

Detailed rules are included in the next chapter.

Right to lodge a complaint with a supervisory authority

Data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

(Regulation Art. 77)

Detailed rules are included in the next chapter.

Right to an effective judicial remedy against a supervisory authority

Every natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them, or when the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint.

(Regulation Art. 78)

Detailed rules are included in the next chapter.

Right to an effective judicial remedy against a controller or a data processor

Every data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.

(Regulation Art. 79)

Detailed rules are included in the next chapter.

DETAILED INFORMATION ON THE RIGHTS OF THE DATA SUBJECT

Right to preliminary notification

Data subject has the right to receive information on the facts and information related to the processing prior to the processing begins.

A) Information to be provided where personal data are collected from the data subject

1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:

- a) the identity and the contact details of the controller and, where applicable, of the controller's representative;
- b) the contact details of the data protection officer, where applicable;
- c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
- d) where the processing is based on point (f) of Article 6(1) (pursuing legitimate interests), the legitimate interests pursued by the controller or by a third party;
- e) the recipients or categories of recipients of the personal data, if any;
- f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

2. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:

- a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- c) where the processing is based on point (a) of Article 6(1) of the Regulation (data subject's consent) or point (a) of Article 9(2) of the Regulation (data subject's consent), the existence of

the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

d) the right to lodge a complaint with a supervisory authority;

e) whether the provision of personal data is a statutory or contractual requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;

f) the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) of the Regulation and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant information as referred to in paragraph 2.

4. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the information. (Regulation Art. 13)

B) Information to be provided where personal data have not been obtained from the data subject

1. Where personal data have not been obtained from the data subject, the controller shall provide the data subject with the following information:

a) the identity and the contact details of the controller and, where applicable, of the controller's representative;

b) the contact details of the data protection officer, where applicable;

c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;

d) the categories of personal data concerned;

e) the recipients or categories of recipients of the personal data, if any;

f) where applicable, that the controller intends to transfer personal data to a recipient in a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means to obtain a copy of them or where they have been made available.

2. In addition to the information referred to in paragraph 1, the controller shall provide the data subject with the following information necessary to ensure fair and transparent processing in respect of the data subject:

a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;

b) where the processing is based on point (f) of Article 6(1) (legitimate interest), the legitimate interests pursued by the controller or by a third party;

c) the existence of the right to request from the controller access to and rectification or erasure of the personal data concerning him or her, as well as to restrict or to object to the processing of the personal data concerning the data subject, as well as the right to data portability;

d) where the processing is based on point (a) of Article 6(1) of the Regulation (data subject's consent) or point (a) of Article 9(2) of the Regulation (data subject's consent), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

e) the right to lodge a complaint with a supervisory authority;

f) from which source the personal data originate, and if applicable, whether it came from publicly accessible sources; and

g) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

3. The controller shall provide the information referred to in paragraphs 1 and 2:

- a) within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
- b) if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
- c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

4. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were obtained, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.

5. Paragraphs 1 to 4 shall not apply where and insofar as:

- a) the data subject already has the information;
- b) the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) of the Regulation or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available;
- c) obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject's legitimate interests; or
- d) the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy. (Regulation Art. 14)

Data subject's right to access

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of data processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the Regulation, and at least in those cases, meaningful information about the logic

involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 of the Regulation relating to the transfer.

3. The controller shall provide the data subject with a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others. (Regulation Art. 15)

Right to erasure (“the right to be forgotten”)

1. The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay, and Controller shall be obliged to erase the personal data concerning the data subject without undue delay, where one of the following grounds applies:

a) personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) of the Regulation, and where there is no other legal ground for the processing;

c) the data subject objects to the processing pursuant to Article 21(1) of the Regulation and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);

d) the personal data have been unlawfully processed;

e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the Regulation.

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

a) for exercising the right of freedom of expression and information;

b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) of the Regulation;

d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

e) for the establishment, exercise, or defense of legal claims.

(Regulation Art. 17)

Right to restriction of processing

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the data subject, in this case the restriction is for a period enabling the controller to verify the accuracy of the personal data;

b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

c) the controller 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 defense of legal claims; or

d) the data subject has objected to processing pursuant to Article 21(1); in this case the restriction is for the period until it is verified whether or not the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense 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.

3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

(Regulation Art. 18)

Right to data portability

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and

b) the processing is carried out by automated means.

2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of this right shall be without prejudice to Article 17 of the Regulation. 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.

4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

(Regulation Art. 20)

Right to object

1. 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) of Article 6(1) of the Regulation (processing 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) or point f) (processing is necessary for pursuing the legitimate interests of controller or a third party), including profiling based on those provisions. The controller shall 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.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
3. Where the data subject objects to processing of personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.
4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the Regulation, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
(Regulation Art. 21)

Automated individual decision-making, including profiling

1. 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.
2. Paragraph 1 shall not apply if the decision:
 - a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
 - b) is authorized by Union or Member State law to which the controller is subject, and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
 - c) is based on the data subject's explicit consent.
3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, including at least data subject's right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.
4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1) of the Regulation, unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.
(Regulation Art. 22)

Restrictions

1. Union or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights provided for in Articles 12 to 22 and Article 34, as well as Article 5 in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22, when such a restriction respects the essence of the fundamental rights and freedoms and is a necessary and proportionate measure in a democratic society to safeguard:
 - a) national security;
 - b) defence;
 - c) public security;

- d) the prevention, investigation, detection or prosecution of criminal offenses or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;
- e) other important objectives of general public interest of the Union or of a Member State, in particular an important economic or financial interest of the Union or of a Member State, including monetary, budgetary and taxation matters, public health and social security;
- f) the protection of judicial independence and judicial proceedings;
- g) the prevention, investigation, detection and prosecution of breaches of ethics for regulated professions;
- h) a monitoring, inspection or regulatory function connected, even occasionally, to the exercise of official authority in the cases referred to in points (a) to (e) and (g);
- i) the protection of the data subject or the rights and freedoms of others;
- j) the enforcement of civil law claims.

2. In particular, any legislative measure referred to in paragraph 1 shall contain specific provisions at least, where relevant, as to:

- a) the purposes of the processing or categories of processing;
 - b) the categories of personal data;
 - c) the scope of the restrictions introduced;
 - d) the safeguards to prevent abuse or unlawful access or transfer;
 - e) the specification of the controller or categories of controllers;
 - f) the storage periods and the applicable safeguards taking into account the nature, scope and purposes of the processing or categories of processing;
 - g) the risks to the rights and freedoms of data subjects; and
 - h) the right of data subjects to be informed about the restriction unless that may be prejudicial to the purpose of the restriction.
- (Regulation Art. 23)

Communication of a personal data breach to the data subject

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

2. The communication to the data subject referred to in paragraph 1 of this Article shall describe in clear and plain language the nature of the personal data breach and contain at least the information and measures referred to in points (b), (c) and (d) of Article 33(3) of the Regulation.

3. The communication to the data subject referred to in paragraph 1 shall not be required if any of the following conditions are met:

- a) the controller has implemented appropriate technical and organizational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorized to access the personal data, such as encryption;
- b) the controller has taken subsequent measures after the personal data breach which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialize;
- c) communication would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

4. If the controller has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the conditions referred to in paragraph 3 are met.

(Regulation Art. 34)

Right to lodge a complaint with a supervisory authority

1. Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

2. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78.

(Regulation Art. 77)

The supervisory authority in Hungary is the National Authority for Data Protection and Freedom of Information. The detailed statutory regulations to be applied are included in Act CXII of 2011 on Informational Self-determination and Freedom of Information.

Right to an effective judicial remedy against a supervisory authority

1. Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them.

2. Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the supervisory authority which is competent pursuant to Articles 55 and 56 does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged pursuant to Article 77.

3. Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

4. Where proceedings are brought against a decision of a supervisory authority which was preceded by an opinion or a decision of the Board in the consistency mechanism, the supervisory authority shall forward that opinion or decision to the court.

(Regulation Art. 78)

Right to an effective judicial remedy against a controller or a data processor

1. Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to Article 77 of the Regulation, each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.

2. Proceedings against a controller or a processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

(Regulation Art. 79)

LODGING A REQUEST BY DATA SUBJECT, CONTROLLER'S MEASURES

1. The controller shall provide to the data subject information on the measures taken in response to his/her request for the exercising of his or her rights without undue delay but under no circumstances later than one month after the receipt of such a request.
2. That period may be extended by two further months where necessary, taking into account the complexity and the number of the requests. the controller shall inform the data subject of any such extension no later than one month after the request has been received and shall provide the reasons for the delay.
3. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information, where possible, shall be provided by electronic means.
4. If the controller does not take action on the request of the data subject, it shall inform the data subject of the reasons for not taking action without delay but not later than one month after the request has been received and shall inform the data subject of the possibility of lodging a complaint with a supervisory authority or seeking a judicial remedy.
5. The data controller shall provide the information pursuant to Articles 13 and 14 of the Regulation and the information on the rights of the data subject (Articles 15 to 22 and 34 of the Regulation) without a fee. If the request of the data subject is unquestionably unfounded or excessive, especially due to its repetitive nature, the controller may, with regard to the administrative costs of providing the requested information or communication or the implementation of the measures:
 - a) charge a fee of HUF 6.350, or
 - b) deny action in response to the request.The burden of proof for determining the unquestionably unfounded or excessive nature of the request shall be borne by the controller.
6. Where the controller has reasonable doubts concerning the identity of the natural person exercising the rights of the data subject, the controller may request the provision of additional information necessary to confirm the identity of the data subject.

DATA SECURITY

In the operation of our information technology systems, we implement the necessary solutions to manage privileges, and apply the necessary internal organizational and technical solutions to ensure that your data cannot be accessed, erased, saved from the system, or altered by unauthorized persons. We ensure that the data protection and data security requirements are observed by our data processors, as well. We keep records of any personal data breach, and where necessary, we inform the data subject of the incidents that have occurred and in so far as it is required by the Regulation.