

GENERAL PRIVACY NOTICE

1. INTRODUCTION

The **Controller** respects your personal rights, and that is why this Privacy Notice – that is accessible on the Controller's official website – has been drawn up.

1.1 Personal scope of the Notice

This Privacy Notice applies to all natural persons whose data are processed by the **Controller**.

1.2 Material scope of the Notice

This Privacy Notice is **exhaustive** in terms of data subjects outside the **Controller's** organization, it does not include, however, employment-related data processing operations, and furthermore, the **Controller** reserves the right to issue special privacy notices that apply to a smaller group of data subjects, in special cases.

2. DETAILS OF THE CONTROLLER

controller: Madách TradeCenter Bt.

registered seat: H-1075 Budapest, Madách Imre út 13-14.

e-mail: info@madachtrade.hu

telephone: +3612681900

company registration number: 01-10-044157

represented by Éva Elter, managing director

(hereinafter referred to as the **Controller** or first person singular)

3. LEGAL REGULATIONS, PRINCIPLES

3.1 In data processing, the Controller shall abide by the following legal regulations

- **GDPR (General Data Protection Regulation)** - Regulation (EU) 2016/679 of the EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the controlling of personal data and on the free movement of such data, and repealing Directive 95/46/EC
- **Data Privacy Act** - Act CXII of 2011 on informational self-determination and freedom of information and the relevant legal regulations on the enforcement thereof
- **E-commerce Act** - Act CVIII of 2001 on certain issues concerning on electronic commerce and on information society services;
- Act IV of 2013 on the Civil Code;
- Act CL of 2017 on the rules of taxation and the relevant legal regulations on the enforcement thereof;
- Act C of 2000 on accounting and the relevant legal regulations on the enforcement thereof;

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- Act XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities;
- Act CXXXIII of 2005 on the rules of personal and property protection activities and private investigation
- Article 155 of Act C of 2003 on electronic telecommunications
- DIRECTIVE 2002/58/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (“Directive on privacy and electronic communications”)

3.2 The following principles are observed in data processing

- Personal data is processed by the Controller only for the purpose and time specified herein. The Controller is required to process such personal data only that is essential for the purpose for which they are recorded and suitable to achieve that purpose.
- Personal data that the Controller becomes aware of during data processing may be disclosed only to such persons assigned or employed by the Controller who has specific tasks to perform in relation to the specific data processing operation.

4. TERMS AND DEFINITIONS

“personal data”: any information relating to a natural person (data subject) (such as name, 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);

“data subject”: identifiable natural person whom the specific personal data applies to. (Such include for example a visitor of the website, a person subscribing to newsletter, an applicant for a job.)

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

“controller”: natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

“processor”: a natural or legal person, public authority, agency or other body which processes personal data on behalf of (upon the assignment, instruction and discretion of) the controller;

“profiling”: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;

“consent of the data subject”: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

5. VISITING THE WEBSITE

5.1.1 Data recorded automatically

If you visit our website, specific data of your device (e.g. Notebook, PC, phone, tablet) are automatically recorded. Such data are the IP address, the time and date of visit, pages visited, the website from where visited our website, the type of browser, the type of operating system, as well as the domain name and address of the Internet service provider. While you are visiting the website, the data to be recorded are automatically logged by the web server hosting the website without any specific statement or action by you. From such data, the system automatically generates statistical data. This information is utilized in aggregate and processed form only in order to correct any potential bug on our website, improve the quality thereof, as well as for statistical purposes.

Purpose of data processing: To monitor the operation of the service and to prepare statistics. In the case of abuse, such data can be used – in cooperation with the visitors' Internet service provider and the competent authorities – to identify the source of abuse.

Legal basis of the data processing: Section (3) of Article 13/A of Act CVIII of 2001 on certain issues concerning on electronic commerce and on information society services.

Duration of the data processing: 2 years following the 1st minute of visit at the website (see the table below for details).

5.1.2 Cookies and similar technologies

What is a cookie?

A cookie is a small text file that is stored on the hard drive of your computer or mobile device until their set date of expiry and is activated upon subsequent visits (sends feedback to the web server). Websites use cookies in order to record information about the specific visit (pages visited, time spent on specific pages, browsing data, quits, etc.) and store personal settings, such data, however, that cannot be associated with the person of the visitor. This tool helps to create a user-friendly website and enhance the online experience of visitors.

There are two types of cookies: “session cookies” and “persistent cookies”. Both types of cookies are stored in the browser until the user deletes them.

- “Session cookies” are stored on your computer, notebook or mobile device only temporarily, until you leave our website; such cookies help the system remember specific information so that you do not have to re-enter or fill in the same information again. The validity of session cookies is limited to the user's current session, and they are intended to prevent data loss (for example, when filling in a form). This type of cookie is automatically deleted from the visitor's computer when the session is ended or the browser is closed.
- “Persistent cookies” are stored on your computer, notebook or mobile device even after you leave the website. These cookies allow the website to recognize you as a returning visitor. Persistent cookies are capable of identifying you through associating the server-side ID to the user, so, in any cases where user authentication is an essential condition of appropriate operation – e.g. online store, online banking, webmail. Persistent cookies do not carry personal data in themselves, and they can only be used to identify the user if the association of data stored in the server's database is performed. The risk of such cookies is that instead of identifying the user, they actually identify the browser, and therefore there is a chance of unauthorized access: for instance, a person signs in an online store from a computer in a public place (e.g. Internet café or library), and leaves the computer without signing out, and later, another person – using the same computer – may access the specific online store under the credentials of the original user.

How can I enable or disable cookies?

Most Internet browsers automatically accept cookies, visitors, however, have the option to delete or reject them. As each browser is different, you can set your cookie preferences individually using your browser's toolbar. If you do not want to enable cookies from our website, you can change the settings of your web browser so that you get notification about the cookies sent, or you can simply reject all cookies. However, you can also delete cookies stored on your computer or mobile device at any time. For more information about the settings, refer to your browser's Help or use directly the links below:

- [Link to Microsoft's guide to cookie settings.](#)
- [Link to Mozilla Firefox's guide to cookie settings.](#)
- [Link to Google Chrome's guide to cookie settings.](#)
- [Link to Opera's guide to cookie settings.](#)
- [Link to Apple Safari's guide to cookie settings.](#)

Please note that if you choose to disable cookies, certain features of the website will not be available for you.

5.1.3 Check the cookies, and you can also disable them

Today's browsers have the option to change cookie settings, as well as to enable and disable cookies

As default, browsers are set to accept cookies, such settings, however, can in any case be changed to match your preferences. Keep in mind, however, that doing so will prevent you from accessing all functions of our website, or the use thereof will not offer maximum convenience for you.

So if you disable such cookies, certain functions of our website (such as session cookies) may become inoperable.

Please select from the list below which browser you use, and find out more about cookies in the settings:

- [Google Chrome](#)
- [Firefox](#)
- [Safari](#)
- [Microsoft Internet Explorer](#)

5.1.4 Review the cookies our website uses

Type of cookie	Legal basis of data processing	Purpose of data processing	Term of data processing	Cookie ID
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Cookie that is essential for operation, without which the website cannot be used.	Section (3) of Article 13/A of the E-commerce Act.	To ensure the basic operation of our website	Depending on the specific type of cookie, these may include: <ul style="list-style-type: none"> • Session cookies until the end of the session, • 1 minute • From 30 seconds to 1 year • 24 hours • 90 days • 2 years 	<ul style="list-style-type: none"> • session_ID • Cookies of Google Analytics (see this link): • _ga • _gid • _gat
Statistical cookies, cookies that improve operation and cookies that support advertising	Your consent	Gathering information about our visitors in order to find out how they use our website, as well as to offer them the most relevant ads possible.	Depending on the specific type of cookie, these may include: <ul style="list-style-type: none"> • Session cookies: until the end of the session, • 1 minute • From 30 seconds to 1 year • 24 hours • 90 days • 2 years 	<ul style="list-style-type: none"> • Google Adwords conversion and remarketing code • Facebook conversion and remarketing code
Google	Your consent			__Secure-SSID
				__Secure-HSID
				__Secure-APISID
				__Secure-3PSID
				__Secure-3PAPISID
				SSID
				SIDCC
				SID
				SEARCH_SAMESITE
				SAPISID
				S
				NID
				HSID
				CONSENT
madachtrade.hu				__utmz
				__utmt
				__utmc
				__utmb
				__utma

5.1.5 Links

For the sole purpose of providing information to visitors, our website may also contain links that are not operated by us. The Controller has no control over the contents and security of websites operated by our partner companies, and therefore shall not take any responsibility for them. Before providing your data in any form, please read the privacy notice of the specific websites you visit.

5.2 Contacts, complaint

Description: If you would like to learn more about our services or submit a complaint, you can contact us via any of our contacts. Our contacts: website form, e-mail: info@madachtrade.hu, phone: +3612681900, post: Madách Trade Center Bt. H-1075 Budapest Madách Imre út 13-14., personal contact.

Categories of data subjects: such natural persons are subject to data processing who has contacted us on their own intention or on behalf of their employer.

Source of data: we process only such data that you provide to us.

Purpose of data processing: to communicate with the inquirer, answer and resolve inquires/requests/complaints.

Legal basis of data processing: your consent (as you were the one who contacted us, we assume your consent to the processing of the provided personal data). Please note that you may, at any time, withdraw your consent, keep in mind, however, that this ways we will not probably be able to answer your inquiry. The withdrawal of consent does not affect the legality of data processing at any time before.

Categories of personal data processed: the data you provide – name, company name, e-mail address, phone number, etc. in general.

Recipients of the personal data processed: your personal data are accessible only for our employees who have specific tasks in relation to the purpose of data processing. Your personal data are not communicated or disclosed to others.

Duration of the data processing:

- when the consent is withdrawn, we erase your personal data without undue delay;
- messages and personal data thus received therein are deleted after the specific inquiry, request or complaint is answered;
- if, however, the purpose of data processing changes due to tax- and / or accounting-related reasons, or in order to protect the rights and interests of the Controller or the inquirer, you will be notified of such fact as well as on the change in the data processing parameters without undue delay .

Ways to withdraw consent to data processing:

- e-mail: info@madachtrade.hu
- via mail: Madách Trade Center Bt. H–1075 Budapest Madách Imre út 13–14.

5.3 Sending newsletters and promotional materials

Description: where appropriate, we provide you as our prospective or current client with information on our services by way of sending occasional newsletters or promotional materials.

Categories of data subjects: such natural persons are subject to data processing who has given consent to the sending of newsletters or promotional materials, during any form of contacting or communication.

Source of data: we process only such data that you provide to us.

Purpose of data processing: marketing activities in order to provide you with information and acquire business to the Controller.

Legal basis of data processing: your consent, if you give your consent to the sending of newsletters and any other marketing information to you. Please note that you can, at any time, withdraw your consent. The withdrawal of consent does not affect the legality of data processing at any time before. If you refuse to provide your data or do not consent to their processing for such purpose, we will not send you newsletters.

Categories of personal data processed: the data you provide – name, company name, e-mail address, phone number, etc. in general.

Recipients of the personal data processed: your personal data are accessible only for our employees who have specific tasks in relation to the purpose of data processing. Your personal data are not communicated or disclosed to others.

Term of data processing: until you withdraw your consent.

Ways to withdraw consent to data processing:

- e-mail: info@madachtrade.hu
- via mail: Madách Trade Center Bt. H-1075 Budapest Madách Imre út 13-14.

5.4 Labour recruitment

Description: Data processing relates to the processing of the data of prospective new employees as long as selection is in progress.

Categories of data subjects: data processing encompasses those natural persons who have contacted us with the purpose of employment.

Sources of data: partly we handle the data you have disclosed to us, but in specific cases we may also request further data from you, or take notes of the enrollment interviews.

Purpose of data processing: maintenance of contacts with the candidates, selection of the appropriate candidates. Upon the completion of the selection process, the purpose of data processing ceases to exist

Legal basis of the data processing: Your consent reflected by your implicit acceptance. Your implicit acceptance is indicated by your response to the job advertisement and/or submission of your CV. You can withdraw your consent at any time, but such withdrawal does not affect the legality of data processing at any time before. Please note that the processing of the personal data that you have submitted to us, or we have requested from you is inevitable for the evaluation of applications and the selection of the appropriate person.

Categories of the processed personal data: the data that you disclose typically include: name, address, e-mail address, telephone, professional qualification and all the information that is shown in the submitted CV.

Recipients of the processed personal data: your personal data are accessible only for our employees who have specific tasks in relation to the purpose of data processing. Your personal data are not communicated or disclosed to others.

Duration of the data processing:

- when the consent is withdrawn, we erase your personal data without undue delay;
- after the selection of the person to be employed for the job concerned, the data of the preferred applicant are transferred to employee data, and erased from the database of applicants;
- after the selection of the person to be employed for the job concerned, unsuccessful applicants are requested to give their consent to the processing of their data for an additional period of 1 year in order to offer them the opportunity to apply for subsequently proposed jobs. If the consent is not given within 30 days, or the request is turned down, the data of the applicant are erased.
- Those applications for general, non-specific job advertisements that are received via mail or e-mail are kept in our database for 1 year. After 1 year, the submitted CV and other personal information are erased.

Ways to withdraw consent to data processing:

- e-mail: info@madachtrade.hu
- via mail: Madách Trade Center Bt. H-1075 Budapest Madách Imre út 13-14.

5.5 Participants in the performance of contracts between legal entities

Description: In general, during the performance of contracts concluded by and between the Controller and other legal entities, it is necessary to process the personal data of the employees, authorized representatives or subcontractors of the contracting party (company, other organization) for the performance of these contracts.

Categories of data subjects: data processing encompasses those natural persons who are involved in the performance of contracts made by and between the Controller and your employer or client.

Sources of data: personal data are disclosed to us by your employer (client) or obtained by us directly from you.

Purpose of data processing: maintenance of contacts in between legal entities for the performance of contracts

Legal basis of the data processing: Legitimate interests of the Controller and the contracted legal entity. Please be advised that you can object to such data processing at any time, and in this case we will consult with your employer (client) to decide on the acceptance or disapproval of your objection based on the outcomes of the consultations.

Categories of the processed personal data: name, company name, position, company e-mail address, company telephone.

Recipients of the processed personal data: your personal data are accessible only for our employees who have specific tasks in relation to the purpose of data processing. Your personal data are not communicated or disclosed to others.

Duration of the data processing:

- if you announce your objection to data processing, and it is accepted by the Controller, your

personal data will be erased without undue delay.

- in 5 years after the fulfillment of the contract, your personal data will be erased.

Form of the announcement of objection to data processing:

- e-mail: info@madachtrade.hu
- via mail: Madách Trade Center Bt. H–1075 Budapest Madách Imre út 13–14.

5.6 Identification for the collection of keys

Description: Keys that belong to the leased properties are collected by the tenants' employees at the reception services, which requires the identification of the persons authorized to collect keys.

Categories of data subjects: data processing encompasses those natural persons who have been appointed by the tenants (as legal entities) for the collection of keys.

Sources of data: personal data are disclosed to us by your employer. For the purpose of identification, reception services may request the presentation of your personal ID card.

Purpose of data processing: identification of the persons collecting the keys of the leased properties.

Legal basis of the data processing: Legitimate interests of the Controller and the contracted legal entity. Please be advised that you can object to such data processing at any time, and in this case we will consult with your employer (client) to decide on the acceptance or disapproval of your objection based on the outcomes of the consultations. Please further note that in case your objection is accepted, we may decline your request for the collection of keys.

Categories of the processed personal data: name, company name, personal ID card number, identifiers of the keys that can be collected, time of the collection and return of the keys.

Recipients of the processed personal data: your personal data are accessible only for the employees of **Intertranssec Kft.**, i.e. the company providing reception services to us and contracted by us as the data processor, as well as for the senior officer of the Controller in the event of any suspicion of crime or offense. Your personal data are not communicated or disclosed to others.

Duration of the data processing:

- if you announce your objection to data processing, and it is accepted by the Controller, your personal data will be erased without undue delay;
- in 1 years after the termination of the authority to collect the keys.

Form of the announcement of objection to data processing:

- e-mail: info@madachtrade.hu
- via mail: Madách Trade Center Bt. H–1075 Budapest Madách Imre út 13–14.

5.7 Entry to the garage

Description: There are leased parking bays in the garage of the Office Complex. The motor vehicles that are authorized to use these parking bays are identified by the license plate number before entering the garage.

Categories of data subjects: data processing encompasses those natural persons who drive the motor vehicles that are authorized to use the parking bays.

Sources of data: the license plate numbers of the vehicles are disclosed to us by your employer.

Purpose of data processing: ensuring the safe operation and lawful use of the garage, as well as the comfort of tenants.

Legal basis of the data processing: fulfillment of the statutory obligations pertaining to the Controller: Act C of 2000 on accounting. The management of the license plate numbers of the motor vehicles is a condition of the performance of the contract made by and between the Controller and the tenants, and the license plate numbers of the motor vehicles are also part of the accounting records associated with the certification of performance.

Categories of the processed personal data: license plate numbers of the motor vehicles that are authorized to enter the garage.

Recipients of the processed personal data: your personal data are accessible only for our employees who have specific tasks in relation to the purpose of data processing. Your personal data are not communicated or disclosed to others.

Duration of the data processing: 9 years pursuant to the relevant provisions of the Accounting Act.

5.8 Records of visitors

Description: The Controller records the personal data of persons visiting the Office Complex to ensure the safety and security of persons and properties.

Categories of data subjects: data processing encompasses those natural persons who enter the Office Complex of the Controller, and are not the tenants' employees.

Sources of data: personal data are disclosed by you on the request of the reception services. For the purpose of identification, reception services may request the presentation, but is NOT authorized to make copies of your photo ID card.

Purpose of data processing: property security, the protection of assets of significant value, as well as trade secrets. Data processing is necessitated by the fulfillment of property security and safety requirements with respect to the fact that it provides fundamental details for the prevention of illegal acts, as well as the investigation and evidencing of violations.

Legal basis of the data processing: Legitimate interests of the Controller and the contracted legal entities (tenants). Please be advised that you can object to such data processing at any time. Should you object to such data processing, the Controller will review your announcement (objection), and consider whether the legitimate interests of the Controller override your own interests, rights and freedoms in relation to the given data processing operations. You will be informed of the outcomes of the consideration of interests and the measures taken without undue delay, no later than within 25 days following the receipt of your request.

Categories of the processed personal data: name, time of entry, visited person.

Recipients of the processed personal data: your personal data are accessible only for the employees of **Intertranssec Kft.**, i.e. the company providing reception services to us and contracted by us as the data processor, as well as for the senior officer of the Controller in the event of any suspicion of crime or offense. Your personal data are not communicated or disclosed to others.

Duration of the data processing:

- if you announce your objection to data processing, and it is accepted by the Controller, your personal data will be erased without undue delay;
- In 3 months, your personal data will be erased.

Form of the announcement of objection to data processing:

Please also note that in specific cases defined in the relevant legal regulations the processed personal data may be disclosed to the competent authorities and courts of justice upon request.

5.9 Camera surveillance

In the area of the Office Complex, the Controller operated a camera surveillance system to ensure the safety and security of persons and properties.

At the respective sites, such camera surveillance is indicated by pictograms and warning boards.

More detailed information in relation to data processing associated with camera surveillance can be requested on site, in the Office Complex.

5.10 Automated decision-making and profiling

The Controller is not involved in automated decision-making and/or profiling operations.

6. YOUR RIGHTS

In connection with data processing, you have the rights detailed hereunder. If you wish to exercise your rights, please contact us at the following contact details:

address: Madách Trade Center Bt. H-1075 Budapest Madách Imre út 13-14.

e-mail address: info@madachtrade.hu

Identification

Before fulfilling any of your requests, we have to confirm your personal identity. If we are unable to confirm your identity, unfortunately we will not be in the position to abide by your request.

Response to your request

After identification, we will provide you with information in relation to your specific request in writing, electronically or – on your request – verbally. Please note that if you have submitted your request electronically, we will respond similarly, in electronic form. Obviously, even in this latter case you have the option to request another form of response.

Administrative time limits

No later than within 1 (one) month following the receipt of your request, we will inform you in relation to the actions we have decided on following your request. That period may be extended by 2 (two) further months where necessary, taking into account the complexity and number of the requests, in relation to which we will also inform you still within the 1-month administrative time limit.

We are also obliged to inform you in case any action or measure has been omitted, still within the 1-month administrative time limit. In this context, you have the option to lodge a complaint to the National Authority for Data Protection and Freedom of Information (NAIH), and exercise your right to seek legal remedies at court.

Administration fee

Any request information or action is free of charges. An exception to this rule is if the request in question is evidently ungrounded or – particularly for its repeated nature – excessive. In this case, we can charge a fee, or refuse the fulfillment of the request.

6.1 Withdrawal of consent

In relation to data processing operations performed with your consent, you can withdraw your consent at any time (Article 7 of the GDPR). In this case, we will erase your personal data in connection with the given data processing operations without undue delay upon the receipt of the associated notice. The withdrawal of consent does not affect the legality of data processing at any time before.

6.2 Request for information (access)

You can request information to see whether your personal data are being processed (Article 15 of the GDPR), and if yes:

- ✓ For what purposes
- ✓ What specific data are being processed
- ✓ To whom these data are forwarded
- ✓ Until when these data are kept
- ✓ What rights and legal remedies you have in this context
- ✓ From whom we have received your data
- ✓ Whether we make any automated decision in relation to you, concerning the use of your personal data. In these cases, you may also request information to see what a logic (method) we apply, and what significance the given form of data processing has, and what expected consequences it entails.
- ✓ If you have experienced that your data have been forwarded to any international organization or third (non-EU) country, you may request the presentation of guarantees for the proper handling of your personal data.
- ✓ You may ask for copies of your processed personal data. (For any further copies, we may charge a fee based on administrative costs.)

6.3 Request for correction

You may request the correction or amendment of your personal data in case they have been recorded inaccurately or incompletely (Article 16 of the GDPR).

6.4 Request for the erasure of your personal data

You may request us to erase your personal data (Article 17 of the GDPR) if:

- the personal data are no longer necessary in relation to the purposes for which they were processed;
- data processing has been performed solely on the basis of your own consent;

- it has been ascertained that the personal data have been unlawfully processed;
- it is otherwise required by any EU or national legal regulation;

The personal data **cannot be erased** in case they are necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject for the performance of a task carried out in the public interest;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defense of legal claims.

6.5 Request for the restriction of processing

You may request us to restrict data processing (Article 18 of the GDPR) if any of the following conditions is met:

- The accuracy of the personal data is contested by the you, for a period enabling us to verify the accuracy of the personal data;
- The processing is unlawful, and the you oppose the erasure of the personal data and requests the restriction of their use instead;
- We no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; or
- You have objected to processing pending the verification whether our legitimate grounds override those of yours;

In the event of any restriction, the personal data shall, with the exception of storage, only be processed with your 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.

You will be given prior notification of the release of such restrictions.

6.6 Request for the delivery of your personal data (right to data portability)

You have the right to receive your personal data in machine-readable format (Article 20 of the GDPR), as well as to forward these data or – on your request – to have these data forwarded to another controller in case data processing is based solely on your own consent, or a contract concluded by you or in your interest, and is performed in an automated form.

That right does 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. That right should not violate the right to erasure, or adversely affect the rights or freedoms of others.

6.7 Objection to the processing of your personal data

You may object to the processing of your personal data (Article 21 of the GDPR) if:

- 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, including any associated profiling;

- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including any associated profiling;

In the above cases, your personal data will be erased unless there are compelling legitimate grounds for the data processing which override your interests, rights and freedoms or the establishment, exercise or defense of legal claims.

You may also object to the processing of your personal data if:

- Data processing is performed for direct marketing (in this context, you may also object to profiling); in this case, your personal data will be erased.
- Your personal data are processed for scientific or historical research purposes or statistical purposes. In this case, your personal data will be erased unless data processing is necessary for the performance of a task carried out in the public interest.

6.8 Rights relating to automated decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling (Article 22 of the GDPR), which produces legal effects concerning you or similarly significantly affects you.

The above provision is not applicable if the decision:

- is necessary for the conclusion of a contract or the performance of a contract concluded with you;
- is authorized by Union or Member State law which lays down suitable measures to safeguard the your rights and freedoms and legitimate interests; or
- is based on your explicit consent.

With the exception of statutory obligations, you have the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

6.9 Legal remedies

6.9.1 Complaints lodged to NAIH

If you think that the processing of the personal data relating to you is in conflict with the requirements of the Data Protection Regulation, you may lodge a complaint to the National Authority for Data Protection and Freedom of Information (NAIH).

president:	Dr. Attila Péterfalvi
mailing address:	H-1530 Budapest, Pf.: 5
address:	H-1125 Budapest, Szilágyi Erzsébet fasor 22/c.
Telephone:	+36 (1) 391-1400
Fax:	+36 (1) 391-1410
web:	http://naih.hu
e-mail:	ugyfelszolgalat@naih.hu

6.9.2 Right to an effective judicial remedy

If you think that the processing of the personal data relating to you is in conflict with the requirements of the Data Protection Regulation, by which your rights set out in the Data Protection Regulation have been violated, you may seek an effective judicial remedy.

All judgments in the legal proceedings shall be made by the tribunal court. At the data subject's own discretion, the court proceedings may as well be initiated at the tribunal court at the address or temporary place of residence of the data subject. Any person otherwise lacking legal capacity to be a party to legal proceedings may also be involved in such legal proceedings. The Authority may intervene in the action on the data subject's behalf.

Beyond the relevant provisions of the Data Protection Regulation, court proceedings are governed by Title XII (Article 2:51–2:54) of Title XII of Part Three of Book Two of Act V of 2013 on the Civil Code, as well as other legal regulations pertaining to court proceedings.

6.9.3 Compensation and restitution

If as a result of unlawful processing of the data subject's data the Controller breaches the data subject's personality rights, grievance award may be claimed from the Controller. The controller shall be discharged from the liabilities for any damage caused and the obligation to pay the grievance award if it is proved that the damage or the breach of the data subject's personality rights has been caused by any uncontrollable circumstance falling beyond the scope of data processing.

7. DATA SECURITY

Taking into account the state of the art from time to time, the costs of implementation and the nature of data processing, as well as the risks posed on the rights and freedoms of natural persons, we take all efforts to implement appropriate technical and organizational measures to guarantee a level of security that is appropriate to the risk.

At all times, we handle personal data confidentially, with limited access and the use of encryption by maximizing resistance as far as it is possible and ensuring restorability in the event of any problem. We regularly test our system to guarantee proper safety and security.

In assessing the appropriate level of security, we take those risks into account that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

We take all possible steps to ensure that any person acting under our authority who has access to the personal data should not process them except on our own instructions, unless it is required to do so by Union or Member State law.

8. DATA PROCESSORS

In relation to the specific data processing operations, we rely on the services of the following data processors:

Activity	Name/Company name	Registered address
Server operation services	MediaCenter Hungary Kft.	H-6000 Kecskemét,

		Sosztakovics u. 3. II/6
Website operation/maintenance services	Civertan Számítástechnikai Oktató és Szolgáltató Bt.	H-1064 Budapest, Izabella u. 69. Fsz. 2.
Accounting software development, maintenance services	Siro Kereskedelmi, Szolgáltató és Tanácsadó Zrt.	H-9023 Győr, Álmos út 5.
Auditing services	Mrs. Fehér Ferencné, private entrepreneur	H-2081 Piliscsaba, Erkel F. u. 16.
Camera system maintenance services	High Sec Kft.	H-1138 Budapest, Toborzó u. 2.
Security guarding services	IntertransSec Kft.	H-1054 Budapest, Berliini út 47-49.
System administrator services	X-com.hu Szolgáltató Kft.	H-1174 Budapest, Ósrepülő utca 26. fsz. 2.

9. DATA FORWARDING

The Controller forwards the personal data of the data subject to the United States of America with the use of the services supplied by the Google Mail and Google Drive systems.

In this case, the proper level of protection in connection with the personal data is guaranteed by the fact that Google LLC has joined the Privacy Shield Framework:

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Further information in relation to the GDPR-compliance of Google is accessible at the following link: <https://cloud.google.com/security/gdpr>