

AXIS BENTONIT Mineral Processor, Distributor and Supplier Ltd.

PRIVACY NOTICE

1. INTRODUCTION

AXIS BENTONIT Mineral Processor, Distributor and Supplier Ltd. (hereinafter: Data Controller) as Data Controller takes seriously the protection of your privacy and confidentiality.

Our privacy notice has been compiled so as to comply with the applicable laws and regulations.

The terms that apply to you are available on our website: www.axibent.hu .

We may review and update this privacy notice from time to time as necessary. Any relevant changes are published on our website. If you have any question regarding our privacy policy, please contact us.

The Data Controller is committed to ensure the highest level of protection to its clients. The

Data Controller undertakes to preserve the confidentiality of personal information and keep

personal data safe at all times. The Data Controller describes its data processing practice below.

The Data controller declares that it does not transfer personal data to a third country (outside the EU) and does not perform automated decision -making , including profiling.

2. DATA CONTROLLER

Name: AXIS BENTONIT Mineral Processor, Distributor and Supplier Ltd. (AXIS BENTONIT Ltd.)

Seat: 3250 Pétervására, 059/8. hrsz.

Branch: 3250 Pétervására, Kossuth L út. 7., 3252 Erdőkövesd, hrsz. 094/3.

Tax number: 24775001 -2-10

Company registration number : Cg. 10 -09-034361

Name of court of registration: Commercial Court of Tribunal of Eger

Representative: Szántó László, managing director

Phone number: +36 70 776 2504

E-mail: rendeles@axisbentonit.hu

Website: www.axibent.hu

3. DEFINITIONS OF TERMS USED IN THE NOTICE:

„Data Subject”: is an identified or identifiable natural person who is the subject of

Personal data.

„Personal Data”: means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an

identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

„Data Controller”: means the 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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

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

„Data Processor”: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

„Data Processing”: means any processing which is performed on personal data by a processor in accordance with the instructions of the controller.

„Personal Data Breach”: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

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

4. PRIVACY PRINCIPLES

In relation to the offer of information society services directly to a child, the processing of the personal data of a child shall be lawful where the child is at least 16 years old. Where the child is below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.

The Controller processes personal data lawfully, fairly and in a transparent manner in relation to the data subject. Processing personal data is adequate, relevant and limited to

what is necessary in relation to the purposes for which they are processed. Personal data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data. If the data subject's consent is given in the context of a written declaration which also concerns other matters, the request for consent shall be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language including the general conditions governing the lawfulness of processing by the controller; the types of data which are subject to the processing; the data subjects concerned; the entities to, and the purposes for which, the personal data may be disclosed; the purpose limitation; storage periods; and processing operations and processing procedures, including measures to ensure lawful and fair processing such as those for other specific processing situations.

The accuracy and completeness, and, if deemed necessary with respect to the purpose of the processing, the up-to-date status of the data shall be ensured throughout the processing; the identification of the data subject shall be possible for no longer than necessary for the purpose of the processing.

The Controller processes personal data lawfully, fairly and in a transparent manner in relation to the data subject. According to the Act CXII of 2011 on the right to informational self-determination and on the freedom of information „The processing of personal data shall be deemed fair and lawful if, for the purpose of ensuring the data subject's right to the freedom of expression, the person wishing to find out the opinion of the data subject visits him at his domicile or place of residence, provided that the data subject's personal data are processed in compliance with this Act and contacting him is not intended for business purposes. Personal visits are not permitted on public holidays under the Labour Code.”

Personal data are not verified by the Data Controller. The Data Subject is responsible for the validity of data provided. When entering the email address, the Data Subject is also responsible for ensuring that the provided email address is only used by him. All liability in connection with entries shall be borne solely by the Data Subject who has registered the email address.

You can enjoy our website www.axibent.hu without giving us your personal data, in accordance to this it is not covered by the general data protection regulation.

The Controller does not store or process any data during browsing of the website.

5. SPECIAL CATEGORIES OF DATA PROCESSING, RANGE OF PERSONAL DATA, PURPOSE AND DURATION OF DATA PROCESSING

Processing is based on consent, however sometimes we must process, store or transfer your information in order to comply with our statutory obligation, about which we will notify our customers.

We would like to inform all Data Subjects that if they did not provide their own personal

data, then it is their obligation to obtain the consent of the Data Subject.

The Controller takes the appropriate and necessary measures in order to ensure that your personal data is processed in full compliance with the relevant laws, especially the ones mentioned below:

- ☐ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- ☐ Act CXII of 2011 on the right to informational self-determination and on the freedom of information
- ☐ Act CVIII of 2001 on electronic commerce and on information society services

5.1 DATA PROCESSED WHEN USING OUR WEBSITE

You can enjoy using our website without giving us your personal data therefore the general data protection in this case is not applicable.

The Data Controller does not store or process any data provided during browsing of the website.

5.2 www.axibent.hu WEBSITE COOKIES POLICY

To provide tailor made service to its clients our website uses cookies. Cookies are small text files that the website stores on the users' computer, however these cookies are not used for data processing purposes.

Lawfulness of processing: in compliance with the Act CVIII of 2001 on electronic commerce and on information society services, the Directive 2002/58/EC and the Act C of 2003 on electronic communications when you first visit our web site we ask you whether you accept to use cookies.

Read more about cookies at:

<https://www.axibent.hu/cookie-szabalyzat>

You can delete all cookies that are already on your device by clearing the browsing history of your browser. You can set most modern browsers to prevent any cookies being placed on your device, but you may then have to manually adjust some preferences every time you visit a site/page. For more detailed control over site-specific cookies, check the privacy and cookie settings in your preferred browser.

5.3 PRIVACY POLICY FOR REMARKETING

We would like to inform all visitors on www.axibent.hu that Facebook pixel is placed on our website. Facebook tracks visitors' IP address showing targeted ads to people who have already visited our site in the next four months.

Purpose of processing: the Controller uses the remarketing pixel of Facebook to run ads specifically to people who have taken a specific action on our website. After visiting our website an external provider – such as Facebook – may show targeted ads on different websites.

Group of data subjects: all natural individuals who purchase goods from the Controller's website

Lawfulness of processing: the consent of the data subject, according to GDPR Article 6 (1) (a) and Act CVIII of 2011 on electronic commerce and on information society services.

Duration of processing: four months after the Data Subject's visit on our website, or until data subject has deleted the data files.

Data processing related activities and process description:

By visiting our website, you are agreeing that the abovementioned codes are stored on your computer and can be accessed by the Data Controller. The codes are generally stored on your computer for four months. However, with the help of your browser you can block all activities done by these codes. If you wish to do so, it can happen that some services of our website are not available.

You can read more about Facebook remarketing on the link below:

<http://www.facebook.com/business/help/651294705016616>

5.4 DATA PROCESSING RELATED TO MESSAGING, CONTACTING AND REQUESTING A QUOTE

Data categories : name and e-mail address of Data Subject

Purpose of data processing: to provide adequate information and keep in touch with the Data Subject

Group of data subjects: any natural person who contacts the controller in order to get information by giving personal data

Lawfulness of data processing: the consent of the data subject, according to GDPR Article 6 (1) (a)

Duration of data processing: until a reply is given to the Data Subject

Data processing related activities and process description:

a. The Data Subject can contact the Data Controller via different platforms suitable for him and consult about available services and/or other related issues

b. The data provided to the Data Controller will be sent by e-mail to axis.kozpont@gmail.com via the website

c. The Data Controller answers the question of the data subject and sends it to him from axis.kozpont@gmail.com - in the same way as the request for information has been received, unless the data subject wishes otherwise

d. The data subject, in accordance with the purpose of data processing, agrees that personal data is provided through which the Data Controller can contact him, and answer the question.

Data recipients : personal data are processed by the colleagues of the Data Controller taking the abovementioned principles into consideration.

5.5 DATA PROCESSING RELATED TO REGISTRATION

Data categories : Data Subject's e-mail address, password, first name, surname and

phone number

Purpose of data processing: by storing the data provided during registration, the Data Controller can provide a more convenient service . Registration is not a condition for concluding a contract.

Group of data subjects: all natural person who registers on the Data Controller's website

Lawfulness of processing: the consent of the Data S ubject, according to GDPR Article 6 (1) (a)

Duration o f processing: for the duration of storing user's personal data in the database, until user requests deletion

Data processing related activities and processes: in order to place an order, the Data Subject can register on the website, where the information required for registration must be provided.

Data recipients: the Data Controller handles personal data in order to complete the registration

5.6 DATA PROCESSING REGARDING LOGIN TO DATA SUBJECT'S ACCOUNT

Data categories: e-mail address and password of Data S ubject

Purpose of processing: by storing the data provided during registration, the Data Controller can provide a more convenient service . Registration is not a condition for concluding a contract.

Group of data subjects: all natural person who registers on the Data Controller's website and logs in to the created account

Lawfulness of processing: the consent of the Data S ubject, according to GDPR Article 6 (1) (a)

Duration of processing: for the duration of storing user's personal data in the database, until user requests deletion

Data processing related activities and processes: in order to place an order, the Data Subject can register on the website, where the information required for registration must be provided. You can then log into the account you created.

Data recipients: the Data Controller handles personal data in order to complete the registration and make login to the created account possible.

5.7 DATA PROCESSING REGARDING PLACING AN ORDER

Data categories: first name, surname, e -mail address and phone number of Data Subject

Purpose of processing: concluding a contract via making a purchase on the website, keeping in touch with the Data S ubject

Group of data subjects: all natural person who places an order on the Data Controller's website

Lawfulness of processing: the consent of the Data S ubject, according to GDPR Article 6 (1) (a)

Duration of processing: for the duration of storing user's personal data in the database, until user requests deletion.

Data processing related activities and processes: in order to place an order, the Data Subject must provide the data controller with the information required to fulfill the order.

Data recipients: on behalf of the Data Controller Tárhely Kft, as Data Processor handles personal data related to the order.

5.8 DATA PROCESSING REGARDING DELIVERY

Data categories: delivery address (postal code, city/town, street, house number)

Purpose of processing: arranging deliveries, keeping in touch with the Data Subject

Group of data subjects: all natural person who places an order on the Data Controller's website and wants the products to be delivered

Lawfulness of processing: the consent of the Data Subject, according to GDPR Article 6 (1) (b)

Duration of processing: 5+2 years following the performance of the contract

Data processing related activities and processes:

In order to place an order and have the goods delivered, the Data Subject must provide the Data Controller with the information required to fulfill the order and deliver the purchased products.

Data recipients:

On behalf of the Data Controller GLS General Logistics Systems Hungary Ltd., as Data Processor handles personal data necessary to make the delivery.

5.9 DATA PROCESSING REGARDING INVOICING

Data categories: surname, first name, e-mail address, phone number, billing address (postal code, city/town, street, house number).

Purpose of processing: performance of contract, issue of an invoice, delivering documentation of payment, fulfilling certain accounting requirements, keeping in touch with the Data Subject

Group of data subjects: all natural person who places an order on the Data Controller's website in order to purchase a product

Lawfulness of processing: in accordance with GDPR Article 6 (1) (c), Act CXXVII of 2007 on Value Added Tax and Act C of 2000 on Accounting.

Duration of processing : for accounting documents, the retention period is 8 years from the closing of the financial year, in accordance with Act C of 2000 on Accounting.

Data processing related activities and processes:

The data processing is performed according to the relevant laws and regulations in order to issue the invoice and fulfill the obligation to keep the accounting document .

Data recipients:

The Data Controller handles personal data to fulfill orders and to issue invoices.

5.10 DATA PROCESSING REGARDING HANDLING COMPLAINTS

Data categories: identification number of complaint, name, address, phone number, bank account (in case of financial compensation), place, time and way of making a complaint, all related documents (e.g. report, notification form) photo

Purpose of processing:

Handling and registering quality issues of products offered by the Data Controller

Group of data subjects:

The customer who lodges a complaint, the merchant and the colleague of the Data Controller

Lawfulness of processing: with the Data Subject's consent, the report is written on the basis of legal obligation in accordance with GDPR Article 6 (1) (a) (c)

Duration of processing:

The retention period for reports and relevant documents shall be for 5 + 2 years in accordance with Act CLV of 1997 on consumer protection.

Data processing related activities and processes:

The data processing is performed according to the relevant laws and regulations in order to issue the invoice and fulfill the obligation to the retention period for the accounting document.

Data recipients:

The Data Controller due to its obligation handles the personal data included in the record of complaint. Recipient can be the Authority of Consumer Protection in case of an investigation.

5.11 NEWSLETTER

According to Act of XLVIII of 2008 (6) on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities advertisements may be conveyed to natural persons after subscribing to newsletter only upon the prior consent of the person to whom the advertisement is addressed.

The Data Controller does not send unsolicited advertisements and the Data Subject has the right to unsubscribe receiving newsletters any time without justification via letter sent to the Data Controller's seat, or via sending an e-mail to info@axibent.hu. By unsubscribing this service all your personal data needed for the newsletter will be deleted and you will not receive newsletter from the Data Controller in the future.

Data categories: surname, first name, e-mail address, the database stores analytical data related to subscription, unsubscribe, opening messages and online activities of data subjects (e.g. date and time of events, viewed contents, IP address of computer, reason for non-delivery).

Purpose of processing: the newsletter is sent to the Data Subject in form of an e-mail to provide information about important news, sales, new functions, upcoming events, general or tailored information sent to the data subject about new product or service announcement or about their cancellation.

Group of data subjects: all natural individuals who subscribe to the Data Controller's newsletter and provides the Data Controller with his personal data

Lawfulness of processing: the Data Subject's consent is needed, in accordance with GDPR Article 6 (1) (a) and the Act XLVIII of 2008 (6)

Duration of processing: until unsubscription of Data Subject from the newsletter.

Data recipients: Only authorized personnel may have access to personal data in line with the necessary access principles, to the extent necessary to perform their duties and permitted by the applicable law.

Possible consequences of failure to provide such data: the Data Subject will not be informed about current offers included in the newsletter.

5.12 DATA PROCESSING REGARDING JUSTIFICATION OF CONSENT

Data categories: Data Subject's IP address, e-mail address, time consent was made

Purpose of processing: data processed and stored after registration, placing an order and subscribing to newsletter for future justification

Group of data subjects: all natural individuals who register, place an order or subscribe to the Data Controller's newsletter

Lawfulness of processing: to comply with our legal obligation, in accordance with GDPR Article 6 (1) (c) and Article 7 (1)

Duration of processing: due to our legal obligation to be able to justify the proof of consent, personal data are processed until the limitation period.

5.13 PRIVACY POLICY FOR SOCIAL NETWORKING SITES

We operate several social media sites: Facebook, Instagram, Twitter, Google+ and Pinterest. The Data subject is only contacted by the Data Controller via social media platforms, if the Data Subject wishes to keep in touch.

Data categories: Data Subject's name, photo and e-mail address public on the given social media site, message sent by the Data Subject via social media, Data Subject's ratings or reviews, any other activities

Purpose of processing: sharing, publication and promotion of contents on social media portals. If you have an account with the social network in question, advertisements tailored to your interest and latest offers can be displayed on your device.

Group of data subjects: all natural individuals who follow, share or like the Data Controller's social networking sites.

Lawfulness of processing: Data Subject's consent, according to GDPR Article 6 (1) (a) and Act CVIII of 2011 on electronic commerce and on information society services, and Act of XLVIII of 2008 (6) on the basic requirements and certain restrictions of commercial advertising activities, according to policies of social networking sites by following or liking the Data Controller's page. For example by hitting the like button

on any of our social networking site you can subscribe to our newsfeed or you can share it, and by hitting the dislike button you can unsubscribe or delete unwanted newsfeed on your wall.

Duration of processing: until Data Subject calls upon to erase them. We have no influence over the duration for which data held by social network operators are stored for their own purposes. For details please refer directly to the social network operators (for example, you may consult their privacy policies).

5.14 EXTERNAL LINKS AND REFERENCES

Our website contains a number of connection points (external links) which takes the visitor to the pages of other service providers so that the visitor to the website can get to www.facebook.com , www.twitter.com . Although, we are not responsible for the data processing activities conducted by social media portals.

5.15 OTHER TYPES OF DATA PROCESSING

We may also process and transfer personal data for purposes not mentioned earlier in the privacy notice, but in this case the Data Subject will be informed about it. We inform our customers that processing your personal data, disclosing data with other persons may be necessary in some cases . Such persons may be, for example public authorities or bodies with public authorities, or organisations with corresponding duties or functions, courts in Hungary etc. for whom the transmission of your data is required to comply with our legal obligations.

6. USE OF DATA PROCESSORS

In certain cases, it may be necessary for the Data Controller to use data processors, which means that we will pass on your personal data, which is also recorded in this privacy statement to the data processor concerned by that service. Data processors with personal data they perform only the tasks according to the instructions of the Data Controller. The Data Controller ensures that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality . Where processing is to be carried out on behalf of a Controller, the Controller shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of GDPR regulation and ensure the protection of the rights of the data subject.

Data Processor

Name: Sedulyák Tamás, self-employed

Seat: 3240 Parád, Hársfa út 4.

Tax number: 67556821-1-30

Representative: Sedulyák Tamás

E-mail: sedutam@gmail.com

Phone: +36 70 584 7374

Activities of the Data Processor : hosting service provider

Data Processor

Name: GLS General Logistics Systems Hungary Ltd.

Seat: 2351, Alsónémedi, GLS Európa utca 2.

Tax number: 12369410 -2-44

Company Registration Number: Cg. 13 -09-111755

Company Registry Court: Company Registry Court of Budapest -Capital
Regional Court

Representative: Back, Rico Ralph Hermann, managing director

E-mail: info@glshungary.com

Phone: +36 1 802 0265

Homepage: www.gls-group.eu

Activities of the Data Processor : parcel delivery

Privacy notice of Data Processor: <https://glshungary.com/group.eu/EU/en/dataprotection/glshungary>

Data Processor

Name: Google Ireland Ltd.

Seat: Gordon House, Barrow Street, Dublin 4, Ireland

Tax number: IE 6388047V

Activities of the Data Processor : Delivery of specific, targeted electronic
advertisements to the data subject based on
personal data approved by the data subject for
advertising purposes

Data processor

Name: Facebook Ireland Ltd.

Seat: 4 Grand Canal Square Grand Canal Harbour
Dublin Ireland

Activities of the Data Processor : Delivery of specific, targeted electronic
advertisements to the data subject based on
personal data approved by the data subject for
advertising purposes

Data processor

Name: Twitter Inc.

Seat: 1355 Market Street Suite 900 San Francisco, CA
94103 United States

Activities of the Data Processor: Delivery of specific, targeted electronic
advertisements to the data subject based on
personal data approved by the data subject for
advertising purposes

When the Data Controller engages another Data Processor for carrying out specific
processing activities on behalf of the controller, the data subject is informed about it at

the beginning of the data processing activity.

7. DATA STORAGE

The Data Controller stores the personal data of the Data Subject on his servers, and servers provided by the hosts.

8. SECURITY OF PROCESSING

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- the pseudonymisation and encryption of personal data
- the ability to ensure the ongoing confidentiality, integrity
- the ability to restore the availability and access to personal data
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

For the protection of data sets stored in different electronic filing systems, suitable technical solutions shall be introduced to prevent - unless this is permitted by law - the

interconnection of data stored in these filing systems and the identification of the data subjects.

To prevent unauthorised use of the processed personal data and related abuses the company applies extensive technical and operational security measures. We continuously monitor and develop our security procedures in line with technical progress.

With regard to the personal data of the data subject, the data controller shall:

- provide protection for the information, and not make personal data available for unauthorized personnel
- protect his personal data and the information related to their processing
- make the personal data and information accessible for the data subject on request

The controller or the processor acting on behalf of, or instructed by, the controller shall record the data connected to any personal data breach occurring in relation to the data processed by it, and it shall, without undue delay but not later than within seventy-two hours after having become aware of it, notify the personal data breach to the Authority. If the controller is prevented from performing in due time its obligation of notification, it shall perform the notification without delay after the obstacle ceases to exist, together with attaching to the notification its statement on the reasons for the delay.

9. RIGHTS OF THE DATA SUBJECT

With regard to the personal data of the data subject processed by the controller or the

processor acting on behalf of, or instructed by, the controller, the data subject shall be entitled to receive information, prior to the start of processing, have his personal data rectified or completed by the controller on his request, have the processing of his personal data restricted by the controller on his request and have his personal data erased by the controller.

9.1 Right to prior information

For the purpose of facilitating the enforcement of the data subject's rights, the controller shall implement appropriate technical and organisational measures, in particular providing, in the cases specified in this Act, the data subject with any notification or information in easily accessible and legible form, with concise, clear and plain content.

9.2 Right to access

For the purpose of enforcing the right to prior information, prior to the start of the processing operations performed by the controller or the processor acting on behalf of, or instructed by, the controller, or at the latest immediately upon the start of the first

processing operation, the controller shall provide the data subject with information concerning :

- the purpose of the processing
- the categories of the personal data concerned
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, including recipients in third countries and international organisations
- envisaged period for which the personal data will be stored
- right to rectification, erasure, restriction of processing and to object
- right to lodge a complaint with a supervisory authority
- the source of collecting the processed personal data
- the fact of automated decision making, including profiling

The controller shall provide the data subject with information within one month after the request.

9.3 Right to rectification

The data subject may request inaccurate personal data to be rectified without delay or, to complete the incomplete personal data in connection with the purpose of data processing, including by means of providing supplementary statement.

9.4 Right to erasure

The Data Subject may request to erase the processed personal data concerning that:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- the data subject withdraws the consent on which the processing is based, and where there is no other legal ground for the processing
- the data subject objects to the processing pursuant and there are no overriding legitimate

grounds for the processing

- the personal data have been unlawfully processed
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law

You may not exercise your right under this subpoint, to the extent that processing is 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 or for the performance of a task carried out in the public interest or in the exercise of official authority
- for reason of public interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- for the establishment, exercise or defence of legal claims

9.5 Right to restriction of processing

The data subject is entitled to request the restriction of the processing of his data, where one of the following applies:

- the data subject contests the accuracy of the personal data, for a period enabling the data controller to verify the accuracy of the personal data
- the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead
- the data 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 defence of legal claims
- the data subject has objected to processing, pending the verification whether the legitimate grounds of the data controller override his.

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

9.6 Right to data portability

The data subject has the right to receive the personal data concerning him, which he has been provided to us, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller.

9.7 Right to object

The data subject has the right to object, on grounds relating to a particular situation, at any time to processing personal data concerning him which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller, or is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, including profiling based on

these provisions. In this case, we may no longer process the personal data unless that we demonstrate compelling legitimate grounds for the processing which override the data subject's interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

9.8 Rights related to automated 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.

9.9 Right to withdraw consent

The data subject shall have the right to withdraw his or her consent at any time.

9.10 Right of access to the court

If the data subject considers that the processing of personal data violates his or her rights under GDPR, the data subject is entitled to take it to the court. The proceeding must be initiated before the competent regional court according to the seat of the data controller or the data subject's usual place of residence. You can find the list of competent regional courts on the following link: <http://birosag.hu/torvenyszekek>

9.11 Right to lodge a complaint with the supervisory authority

The data subject has the right to lodge a complaint with a supervisory authority. The national supervisory authority in Hungary is Nemzeti Adatvédelmi és

Információszabadság Hatóság. Seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Pf.: 5.

Phone: 0613911400

Fax: 0613911410

E-mail: ugyfelszolgalat@naih.hu

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

9.12 Notification of personal data breach

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

The notification to the data subject shall at least describe the nature of the personal data breach including where possible, the categories and approximate number of data subjects concerned and the categories and approximate number of personal data records concerned; communicate the name and contact details of the data protection officer or other contact point where more information can be obtained; describe the likely consequences of the personal data breach; describe the measures taken or proposed to

be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

The communication to the data subject shall not be required if any of the following conditions are met:

- the controller has implemented appropriate technical and organisational 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 authorised to access it, such as encryption;

-the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects is no longer likely to materialise;

-it 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.

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 are met.

9.13 Right to compensation and liability

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. Any controller involved in processing shall be liable for the damage caused by processing which infringes this Regulation. A processor shall be liable for the damage caused by processing only where it has not complied with obligations of this Regulation specifically directed to processors or where it has acted outside or contrary to lawful instructions of the controller. Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and where they are, responsible for any damage caused by processing, each controller or processor shall be held liable for the entire damage in order to ensure effective compensation of the data subject.

A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

9.14 Rules of procedure

-The Data Controller shall notify the Data Subject any action taken on the request without delay, but no later than one month from the receipt of your request to exercise the rights set out under this point.

- Taking into account the complexity of the request and the number of the requests, this deadline may be extended by further two months if necessary. The Data Controller will notify the Data Subject on the extension of the deadline by indicating the reasons of the delay, within one month from the receipt of the request. If the Data Subject has submitted the request electronically, the information will be provided electronically as long as possible, unless otherwise requested.

-If the Data Controller for any reason does not take action on request, it will notify the Data Subject – without delay, but at latest within one month from the receipt of the request of the reasons of taking no actions and where to address your complaint and other remedies that the Data Subject is entitled to.

-The information provided in connection with the rights set out hereof as well as the performance of your request are free of charge. However, we would like to note, that a fair amount of administrative fees can be charged for the fulfilment of the requests if they are manifestly unfounded or in particular because of their repetitive character, or we can refuse to act on such request.

-For the integrity of your rights, the Data Controller informs all recipients of all corrections, deletion or restriction of processing according to the rights set out hereof, to whom we have disclosed your personal data, unless it proves to be impossible or would involve a disproportionate effort. At your request, we provide you with information on these recipients.

10. PRIVACY NOTICE UPDATES

If necessary, we may amend or update this Privacy Notice to reflect changes on the website and feedback from our users. If there are material changes in the way we use or process your personal data, we will notify you by posting a notice of the changes before these come into effect or by sending a notification to you directly. We encourage you to re-read this notice regularly to gain more information on how we use and protect your data.

For any other data processing, that may not be indicated in the privacy notice, 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:

- ☐ the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- ☐ 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;
- ☐ where the processing is based on the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

- ☐ the right to lodge a complaint with a supervisory authority;
- ☐ whether the provision of personal data is a statutory or contractual requirement, or a 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;
- ☐ the existence of automated decision-making, including profiling, 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.

Where the Data 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 and the Data Subject's consent is needed.

