INTERGEST HUNGARIA LTD. PRIVACY POLICY

1. Purpose of this Privacy Notice

The purpose of this Privacy Notice is to provide information about the data protection and data management principles applied by InterGest Hungaria Kft. (hereinafter referred to as the "Data Controller") in connection with the sending of the newsletter and the contact form.

The Data Controller processes the personal data of visitors to the website https://intergest.hu/ (hereinafter referred to as the "Website"), newsletter subscribers and contact form fillers.

The data provided in connection with the completion of the contact form and any attached documents are processed for the following purposes (described in detail in section 3):

- Contact: to respond to enquiries from visitors to the Site and other persons.
- **Administration:** to deal with a question, request or complaint from a data subject based on the information provided in the form.
- **Recruitment:** if the data subject attaches a CV, the data are used to facilitate the selection process.

2. <u>Data controller's data</u>

Name of the Data Controller: InterGest Hungaria Kft.

The Data Controller's registered office is 30, Lövőház utca, 1024 Budapest, Hungary.

The company registration number of the Data Controller is 01-09-889795,

Tax number of the Data Controller: 1419596-2-41

Telephone contact of the Data Controller: 00 -36-1-438-4435

Electronic contact details of the Data Controller: <u>k.hegyes@intergest.hu</u> Address of the Data Controller: 1024 Budapest, Lövőház utca 30.

Data Protection Officer of the Data Controller: no such person is employed by the Data

Controller.

3. The controller is not the Data Controller.

3.1. Data processing relating to Cookies

See in detail in the Cookie Notice.

3.2. Processing of data relating to the completion of the contact form

The Controller processes the following personal data in connection with the contact form

Scope of the data processed: name, e-mail address, message content, possible attachments, e.g. biography

Purpose of processing: contact, administration or recruitment.

Legal basis for processing:

3.2.1. contact and administration: article 6(1)(b) GDPR - to fulfil the obligations of the Data Controller in relation to the reply to and the administration of the request, for which the processing of the data of the data subject is indispensable.

Retention period: the Data Controller shall keep the data for one year from the date of the closure of the request.

3.2.2. recruitment (in case of attachment of a CV): article 6(1)(b) GDPR - to fulfil the obligations of the Data Controller in relation to the management of the recruitment process and the preparation of the contract with the successful candidate, for which the processing of the data of the data subject is indispensable.

Retention period: The Data Controller shall retain CVs and related documents for a maximum of one year after the conclusion of the recruitment process; in the case of successful applicants, the documents related to the recruitment process shall become part of the employment documentation.

For special categories of personal data (e.g. health information in a request): article 9(2)(a) GDPR - explicit consent of the data subject.

Retention period personal data will be retained by the Data Controller until consent is withdrawn, but not longer than the purpose of the processing.

3.3. Processing of data relating to newsletter subscriptions

In connection with the sending of the newsletter, the Data Controller processes the following personal data of the person subscribing to the newsletter:

Name, company name, e-mail address

Purpose of the processing Sending electronic newsletters and other marketing material by e-mail

Legal basis for processing: Article 6(1)(a) GDPR (voluntary consent of the potential recipient by ticking an empty tickbox. The recipient can unsubscribe from the newsletter at any time. This does not affect the lawfulness of the processing prior to unsubscription.

4. Data processing

The Data Controller, when processing the personal data listed in point 3, uses a data processor for the purpose of hosting services in order to ensure the storage and availability of the data. The duration of the processing is set out in the contract in force between the Data Controller and the processor.

The hosting provider is Rackforest Informatikai Kereskedelmi Szolgáltató és Tanácsadó Zrt.

Address: 1132 Bp., Victor Hugó utca 11. 5.em B05001

• Phone number: +36 1 211 0044

Electronic contact: <u>info@rackforest.hu</u>

5. Data subject's rights and means of redress

5.1 The data subjects' data protection rights and remedies and their limitations are set out in detail in the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). The data subject may at any time request information about the processing of his or her data, request the rectification, erasure or restriction of the processing of his or her data, object to processing based on legitimate interest at any time and have the right to data

portability.

- 5.2 The Data Controller shall inform the data subject of the measures taken in response to the request concerning his or her rights listed below without undue delay and in any event within one month of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Data Controller shall inform the data subject of the extension of the time limit, stating the reasons for the delay, within one month of receipt of the request. Where the data subject has made the request by electronic means, the information shall, where possible, be provided by electronic means, unless the data subject requests otherwise.
- 5.3 The Controller shall provide the above information in writing or by other means, including, where appropriate, by electronic means. At the request of the data subject, information may also be provided orally, provided that the identity of the data subject has been verified by other means.
- 5.4 In the Annex to this Privacy Notice, the Data Controller summarises the data subject's main data protection rights in relation to the processing purposes covered by this Privacy Notice.

6. Other provisions

The Data Controller reserves the right to amend this Privacy Notice unilaterally, with effect from the date of the amendment, subject to the restrictions set out in the applicable legislation and, where necessary, with prior and adequate notice to the data subjects. In particular, this Privacy Notice may be amended if necessary due to changes in legislation, the practices of data protection authorities, business or employee needs, new activities involving the processing of personal data, newly identified security risks or feedback from data subjects. When communicating with data subjects in relation to this Privacy Notice or data protection issues, or otherwise contacting data subjects, the Data Controller may use the contact details of the data subject available to the Data Controller for contact and communication purposes. For example, upon request, the Data Controller may send the data subject a copy of the current Data Protection Notice or confirm that the data subject has read the Data Protection Notice.

ANNEX DATA SUBJECTS' RIGHTS IN RELATION TO DATA PROCESSING

1. Right of access

The data subject shall have the right to obtain from the Controller information as to whether or not his or her personal data are being processed and, where such processing is taking place, the right to obtain from the Controller information as to whether or not the Controller

- which personal data;
- on what legal basis;
- for what purpose;
- for how long

for how long; and

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

The Data Controller shall provide a copy of the personal data subject to the processing free of charge for the first time upon the data subject's request, and may charge a reasonable fee based on administrative costs thereafter.

In order to ensure data security and to protect the rights of the data subject, the Data Controller shall verify the identity of the data subject and of the person who wishes to exercise the right of access, and to this end, the provision of information, access to or copying of the data shall be subject to the identification of the data subject.

2. Right to rectification

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

3. Right to blocking (restriction of processing)

The data subject may request that the controller restrict the processing of his or her personal data (by clearly indicating the limited nature of the processing and ensuring that it is kept separate from other data) where

- contests the accuracy of his or her personal data (in which case the Controller will limit the processing for the time necessary to verify the accuracy of the personal data):
- the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- the controller no longer needs the personal data for the purposes of the processing but the data subject requires them for the establishment, exercise or defence of legal claims; or

• the data subject has objected to the processing (in which case the restriction applies for a period of time until it is established whether the legitimate grounds of the Controller prevail over the legitimate grounds of the data subject).

4. Right to object

The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data on the basis of legitimate interests. In such a case, the Controller must demonstrate compelling legitimate grounds for processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

5. Right to erasure ("right to be forgotten")

The data subject shall have the right to obtain, upon his or her request and without undue delay, the erasure of personal data relating to him or her by the Controller where one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed by the Controller;
- b) the data subject objects to the processing and, where applicable, there are no overriding legitimate grounds for the processing; or
- c) the personal data have been unlawfully processed.

The right to erasure does not apply where the processing is necessary, inter alia, for the establishment, exercise or defence of legal claims.

6. Right to legal remedy

If the data subject considers that the Data Controller has infringed the applicable data protection requirements in the processing of his/her personal data, he/she may

- may lodge a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11, postal address: 1363 Budapest, PO Box 9, e-mail: ugyfelszolgalat@naih.hu, website: https://www.naih.hu/), or
- have the right to apply to the courts, which will rule on the matter out of turn, in order
 to protect your data. In this case, you are free to choose whether to bring an action
 before the competent court in your place of residence (permanent address) or in
 the place of stay (temporary address) or in the court of the place where the Data
 Controller has its registered office. The court of the place of residence or domicile
 can be found at https://birosag.hu/birosag-kereso.