



INFORMATION LETTER ABOUT THE HANDLING OF THE DATA OF NATURAL PERSONS BY THE COMPANY AND THE RIGHTS OF THE PEOPLE CONCERNED

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INTRODUCTION

REGULATION OF THE EUROPEAN PARLIAMENT AND THE (EU) COUNCIL 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, as well as on the repeal of Regulation 95/46/EK (hereinafter: the Regulation), stipulates, that the Data Controller takes appropriate measures in order to provide the person concerned with all information related to the processing of personal data in a concise, transparent, understandable and easily accessible form, clearly and comprehensibly formulated, and that the Data Controller facilitates the exercise of the rights of the person concerned.

The obligation of prior informing the person concerned is also required by Act CXII of 2011 about the right of informational self-determination and freedom of information.

We comply with this legal obligation by providing the information below.

The information must be published on the company's website or sent to the person concerned upon request.

CHAPTER I. NAME OF THE DATA CONTROLLER

1. The publisher of this information letter is at the same time the Data Controller:

COMPANY NAME:	MAHART CONTAINER CENTER KFT.
DOMICILE:	1211 Budapest, Weiss Manfréd út 5-7.
OTHER SITE:	1185 Budapest, BUD Budapest Nemzetközi Reptér, BUD Budapest International Airport
Co. RESISTRATION No.:	Cg. 01-09-675632
TAX NUMBER:	11767482-2-43.
WEBSITE:	www.containercenter.hu
E-MAIL ADDRESS:	mail@containercenter.hu
PHONE NUMER:	+36-1-278-31-78
NAME OF REPRESENTATIVE:	Fábián Zoltán managing director

(hereinafter: Company, or Data Controller)

CHAPTER II. NAME OF DATA MANAGERS, PROCESSORS

Data Processor: the natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller; (Regulation 4. Article 8.).

The use of the data processor does not require the prior consent of the person concerned, but information is required. Accordingly, we provide the following information:

2. Data Processors of our company

2.1. Our company's payroll service provider

2.2. Our company is a provider of postal and courier services

2.3. Our company's subcontractor dealing with occupational health and ability to work

2.4. Our company's subcontractor for handling of the webpage

CHAPTER III.

INFORMATION ON PARTICULAR DATA PROCESSING

3. Information on data management based on the consent of the person concerned

3.1. If the Company wishes to carry out consent-based data management, the concerned person's consent to the processing of his personal data must be requested with the content and information of the data request form specified in the data management regulations.

3.2. Consent is also considered if the concerned person ticks a relevant box when viewing the Company's website, makes relevant technical settings when using services related to the information society, as well as any other statement or action that, in the given context, clearly indicates the planned handling of his/her personal data and constitutes the concerned person's consent. Silence, a pre-ticked box or inaction therefore does not constitute consent.

3.3. Consent covers all data processing activities carried out for the same purpose or purposes. If data processing serves several purposes at the same time, consent must be given for all data processing purposes.

3.4. If the person concerned gives his/her consent in the context of a written statement that also applies to other matters - e.g. the conclusion of a sales or service contract - the request for consent must be presented in a way that is clearly distinguishable from these other matters, in an understandable and easily accessible form, with clear and simple language. Any part of such a statement containing the consent of the person concerned that violates the Regulation is not binding.

3.5. The Company cannot link the conclusion or performance of a contract to the consent of processing personal data, if this is not necessary for the fulfilment of the contract.

3.6. Withdrawal of the consent should be made possible in the same simple way as to giving the consent.

3.7. If the personal data was collected with the consent of the person concerned, the data controller may, unless otherwise provided by law, process the collected data for

the purpose of fulfilling the relevant legal obligation without further separate consent, and also after the withdrawal of the consent of the person concerned.

4. Information on the management of data of customers, contracting partners and contact persons

4.1. The Company, as a legal title of fulfilling a contract, for the purpose of concluding, fulfilling, terminating a contract, or providing discount, handles the name, birth name, date of birth, mother's name, address, tax identification number, tax number, entrepreneur's and original producer's ID card number, identity card number, residential address, address of headquarters and other sites, telephone number, e-mail address, website address, bank account number, customer number (customer number, order number), online identifier (list of customers, suppliers, regular customer lists) of the natural person contracted with as buyer or seller. This data processing is considered lawful even if, the data management is necessary to take steps at the request of the person concerned prior to the conclusion of the contract. Recipients of personal data: the Company's employees performing tasks related to customer service, employees performing accounting and taxation tasks, and data processors. Duration of storage of personal data: 5 years after termination of the contract.

4.2. The legal basis for handling the data of the contracting natural person for accounting and tax purposes is the fulfilment of a legal obligation, in this case the duration of data storage is 8 years.

4.3. The Company handles the personal data, as well as the residential address, e-mail address and telephone number, online identifier of the natural person, who acts on behalf of the contracting legal entity, signs the contract, on the basis of exercise of the rights and obligations arising from the contract, and the legitimate interest for the purpose of maintaining contact. The keeping period for this data is 5 years after the termination of the contract. In the case of legitimate interests, the person concerned subject has an emphasised right to object to data processing.

4.4. The Company handles the name, address, telephone number, e-mail address, and online identifier of the natural person designated as the contact person in the contract concluded – who does not sign the contract -, as a legitimate interest for the purpose of maintaining contact and exercising the rights and obligations arising from the contract, taking into account that the contact person is in a legal relationship aimed at employment with the contracting party, so this data management does not adversely affect the rights of the person concerned. The contracting party declares that it has informed the contact person concerned about the data management related to the quality as the contact person. The duration of the storage of this data is 5 years after the existence of the contact quality.

4.5. Recipients of personal data in relation to all stakeholders: Company's executive manager, its employees performing tasks related to customer service, contacts, employees performing accounting and taxation tasks, and data processors

4.6. The personal data may be transferred for data processing to the accounting office commissioned by the company for the purposes of taxation and bookkeeping, to the

Magyar Posta for postal delivery, or to the commissioned courier service, the webpage handling company, respectively to the company's asset protection agent for asset protection.

4.7. Data processing is considered lawful if it is necessary in the context of a contract or intention to enter into a contract (Preamble 44.) if it is necessary to take steps at the request of the person concerned prior to the conclusion of the contract (Article 6 (1) b./). Thus, personal data collected in the context of contract offers can also be processed under the legal title of contract performance as described in this point. When making an offer or accepting a bet, the Company is obliged to inform the offering party and the recipient of the offer.

5. Information on data management based on the fulfilment of a legal obligation

5.1. In the case of data management based on legal obligations, the scope of data that can be handled, the purpose of data management, the duration of data storage and recipients are governed by the provisions of the underlying legislation.

5.2. Data management based on the legal title of fulfilling a legal obligation is independent of the concerned person's consent, as data management is defined by law. In this case, before data processing begins, the person concerned must be informed that data processing is mandatory, and the person concerned must be informed clearly and in detail about all the facts related to the processing of his data before data processing begins, including, in particular, the purpose and legal basis of data processing, the person entitled to data management and data processing, on the duration of the data management, on whether the personal data of the data subject is managed by the data controller based on the relevant legal obligation, and on who can see the data. The information must also cover the concerned person's rights and legal remedies. In the case of mandatory data management, the information can also be provided by publishing a reference to the legal provisions containing the above information.

6. Information on data processing for the purpose of fulfilling tax and accounting obligations

6.1. The Company handles the legally defined data of natural persons entering into a business relationship with the company as a customer or supplier, for the purpose of fulfilling legal, tax and accounting obligations prescribed by law (bookkeeping, taxation). The processed data is in accordance with act CXXVII of 2017 § 169 and § 202 on value added tax, in particular: tax number, name, address, tax status, pursuant to § 167 of Act C of 2000 on accounting: name, address, person or organization ordering the business transaction, the signature of the remitting person and the person certifying the implementation of the provision, as well as the inspector, depending on the organization; the signature of the receiver on the stock movement receipts and money management receipts, and the payer's signature on the receipts, based on act CXVII of 1995 on personal income tax: entrepreneur ID number, primary producer ID number, tax identification number.

6.2. Data management related to driving registration and waybills: Company manages the legally defined data of the use of the company's and the employee's own vehicle used for official and business purposes (name of the driver, type of vehicle, registration number, date of the travel, purpose, route taken, name of business partner visited). The relevant legislation act. 1995:CXVII. (personal income tax act.) § 27/2/, Appendix 3, point 6 and Appendix 5, point 7.

6.3. The period of storage of personal data is 8 years after the termination of the legal relationship providing the legal basis.

6.4. Recipients of personal data: Company's employees and data processors performing tax, accounting, payroll, and social security tasks.

7. Information on payment data management

7.1. The Company processes the personal data of those concerned - employees, their family members, contractors, recipients of other benefits - as required by tax laws for the purpose of fulfilling legal obligations, fulfilling tax and contribution obligations prescribed by law (tax, advance tax, determination of contributions, payroll, social security, pension administration), whom the company is in payer's relation (2017 act no. CL. Act on the Taxation Order (Art.) 7.§ 31.). The scope of the processed data is determined by § 50 of Art., highlighting separately from this: the natural person's natural personal identification data (including the previous name and title), gender, citizenship, the natural person's tax identification number, social security identification number (TAJ number). If the tax laws link legal consequences to this, the Company may process the employees' health (Personal Income Tax Act. Szja tv.§ 40.) and trade union (Szja tv. § 47.(2) b./) data for the purpose of fulfilling tax and contribution obligations (payroll, social security administration).

7.2. The period of storage of personal data is 8 years after the termination of the legal relationship providing the legal basis.

7.3. Recipients of personal data: Company's employees and data processors performing tax, payroll, social security (paying) tasks.

8. Information on data management for documents permanently archived according to the Archives Act

8.1. The Company handles based on legal obligations the documents that are qualified as permanent value by Act LXVI of 1995 on public documents, public archives and the protection of private archive material (Archives Act), with the aim of ensuring that the permanent part of the Company's archival material remains intact and usable for future generations. Time of data storage: until transfer to the public archive.

8.2. Recipients of the personal data: the head of the Company, its employees performing document management and archiving, the employees of the public archive.

9. Supporting the rights of the person concerned

During all data management, the Company is obliged to ensure exercising of the rights of the person concerned.

CHAPTER IV. DATA MANAGEMENT OF THE VISITORS ON THE COMPANY'S WEBSITE - INFORMATION ON THE USE OF COOKIES

10. General information about cookies

10.1. Website visitors must be informed about the use of cookies on the website, and their consent must be requested.

10.2. A cookie is such a data that the visited website sends to the visitor's browser (in the form of a variable name and value) so that it can store it and later the same website can load its content. Cookies can be valid until the browser is closed, or for an unlimited time. In the future, the browser also sends this data to the server for every HTTP(S) request. This way it modifies the data on the user's machine.

10.3. The essence of the cookie is that, due to the nature of website services, it is necessary to mark a user (e.g. that he has entered the page) and be able to handle it accordingly in the following. The danger lies in the fact that the user is not always aware of this and it may be suitable for the user to be followed by the operator of the website or another service provider whose content is integrated into the page (e.g. Facebook, Google Analytics), thereby creating a profile about him, and in this case the content of the cookie can be considered personal data.

10.4. Types of cookies:

10.4.1. Session cookies are technically absolutely necessary: without them, the site would simply not work functionally, they are used to identify the user, e.g. necessary to manage whether the user entered, what the user put in the basket, etc. This is typically the storage of a session ID, the rest of the data is stored on the server, which is therefore more secure. It has a security aspect, if the value of the session cookie is not generated well, there is a risk of a session-hijacking attack, so it is absolutely necessary that these values are generated correctly. Other terminologies call all cookies that are deleted when you exit the browser as a session cookie (a session is a browser usage from start to exit).

10.4.2. Usage-facilitating cookies: these are usually called as cookies that remember the user's choices, for example in what form the user wants to see the page. These types of cookies essentially mean the setting data stored in the cookie.

10.4.3. Performance cookies: although they have little to do with "performance", cookies that collect information about the user's behavior, time spent, and clicks on the visited website are usually called this. These are typically third-party applications (e.g.

Google Analytics, AdWords, or Yandex.ru cookies). These are suitable for profiling the visitor.

You can find out more about Google Analytics cookies here:

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

You can find out more about Google AdWords cookies here:

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

10.5. Accepting and authorizing the use of cookies is not mandatory. You can reset your browser settings to reject all cookies or to notify you when a cookie is currently being sent. Although most browsers automatically accept cookies by default, they can usually be changed to prevent automatic acceptance and offer a choice each time.

10.6. You can find information about the cookie settings of the most popular browsers at the links below

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

However, we would like to call the attention, that it can be possible that certain website functions or services may not function properly without cookies.

11. Information about the cookies used on the Company's website and the data generated during the visit

11.1. The scope of data managed during the visit: During the use of the website, our company's website can record and manage the following data about the visitor and the device used for browsing:

- the IP address used by the visitor,
- the type of browser,
- characteristics of the operating system of the device used for browsing (set language),
- date of visit,
- the visited (sub)page, function or service,
- click.

We keep this data for a maximum of 90 days and can primarily be used to investigate security incidents.

11.2. Cookies used on the website

11.2.1. Session cookies are technically essential.

The purpose of data management is to ensure the proper functioning of the website. These cookies are necessary so that visitors can browse the website, use its functions smoothly and fully, the services available through the website, so - among others - in particular the remembering of the actions performed by the visitor on the given pages or the identification of the logged-in user during a visit. The duration of the data management of these cookies applies only to the visitor's current visit, this type of cookie is automatically deleted from the computer when the session ends or when the browser is closed.

The legal basis for this data management is Act CVIII 13/A. § (3) of 2001 on certain issues of electronic commercial services and information society services, according to the paragraph the service provider may process the personal data that is technically absolutely necessary for the provision of the service for the purpose of providing the service. If the other conditions are the same, the service provider must choose and in any case operate the tools used in the provision of services related to the information society in such a way that personal data is only processed if this is absolutely necessary for the provision of the service and the fulfilment of other objectives defined by the law necessary, but also in this case only to the extent and for the necessary time.

11.2.2. Cookies facilitating use:

These remember the user's choices, for example in what form the user wants to see the page. These types of cookies essentially mean the setting data stored in the cookie. The legal basis for data management is the visitor's consent.

Purpose of data management: Increasing the efficiency of the service, increasing the user experience, making the use of the website more convenient.

This data is rather on the user's computer, the website can only access and recognize the visitor through it.

11.2.3. Performance cookies:

They collect information about the user's behavior within the visited website, time spent, and clicks. These are typically third-party applications (e.g. Google Analytics, AdWords).

Legal basis for data management: the consent of the data subject.

The purpose of data management is to analyze the website and provide information to customers

CHAPTER V INFORMATION ON THE RIGHTS OF THE PERSON CONCERNED

12. The rights of the person concerned briefly summarized:

1. Transparent information, communication and facilitating the promote of the rights of the person concerned.

2. Right to preliminary information - if personal data is collected from the person concerned.
3. Informing the person concerned and the information to be made available to him/her, if the personal data was not obtained from him by the data controller.
4. The concerned person's right of access.
5. Right to rectification.
6. The right to deletion (“the right to be forgotten”).
7. The right to restrict data processing.
8. Notification obligation related to the correction or deletion of personal data or the limitation of data management.
9. The right to data transferability.
10. Right to protest.
11. Automated decision-making in individual cases, including profiling.
12. Limitations, restrictions.
13. Informing the person concerned about the data protection incident.
14. The right to complain to the supervisory authority (right to an official legal remedy).
15. Right to an effective judicial remedy against the supervisory authority.
16. Right to an effective judicial remedy against the controller or data processor.

13. Rights of the person concerned in detail:

13.1. Transparent information, communication and facilitating the promote of the rights of the person concerned

13.1.1. The data controller must provide the person concerned with all information and every piece of information regarding the processing of personal data in a concise, transparent, understandable and easily accessible form, clearly and comprehensibly worded, especially in the case of any information addressed to children. The information must be provided in writing or in another way, including, where applicable, the electronic way. Verbal information can also be provided at the request of the person concerned, provided that the identity of the person concerned has been verified in another way.

13.1.2. The data controller must facilitate the exercise of the concerned person's rights.

13.1.3. The data controller informs the person concerned without undue delay, but in any case within one month of the receipt of the request, about the measures taken as a result of his request to exercise his rights. This deadline can be extended by another two months under the conditions set out in the Regulation, about which the person concerned must be informed.

13.1.4. If the data controller does not take measures following the concerned person's request, it shall inform the person concerned without delay, but at the latest within one month of the receipt of the request, about the reasons for the failure to take action, as well as that the person concerned may file a complaint with a supervisory authority and exercise his right to judicial redress.

13.1.5. The data manager provides the information and measures about the rights of the data subject free of charge, however, in the cases described in the Regulation, a fee may be charged.

The detailed rules can be found under Article 12 of the Regulation.

13.2. Right to preliminary information - if personal data is collected from the person concerned

13.2.1. The person concerned has the right to receive information about the facts and information related to data management before the start of data management. In this context, the person concerned must be informed:

- a) the identity and contact details of the data controller and its representative,
- b) the contact details of the data protection officer (if any),
- c) the purpose of the planned processing of personal data and the legal basis of data processing,
- d) in the case of data management based on the assertion of a legitimate interest, about the legitimate interests of the data controller or a third party,
- e) about the recipients of the personal data - with whom the personal data is communicated - and the categories of recipients, if any;
- e) where applicable, the fact that the data controller wishes to transfer the personal data to a third country or international organization.

13.2.2. In order to ensure fair and transparent data management, the data controller must inform the person concerned about the following additional information:

- a) on the period of storage of personal data, or if this is not possible, on the criteria for determining this period;
- b) the concerned person's right to request from the data controller access to personal data relating to him, their correction, deletion or restriction of processing, and to object against to the processing of such personal data, as well as the data subject's right to data transferability;
- c) in the case of data processing is based on the consent of the person concerned, the right to withdraw the consent at any time, which does not affect the legality of the data processing carried out on the basis of the consent before the withdrawal;
- d) on the right to submit a complaint to the supervisory authority;
- e) whether the provision of personal data is based on legislation or a contractual obligation or is a prerequisite for the conclusion of a contract, as well as whether the person concerned is obliged to provide the personal data, and what possible consequences the failure to provide data may have;
- f) the fact of automated decision-making, including profiling, as well as, at least in these cases, the logic used and understandable information regarding the significance of such data management and the expected consequences for the data subject.

13.2.3. If the data controller wishes to carry out further data processing on personal data for a purpose other than the purpose of their collection, it must inform the person concerned of this different purpose and all relevant additional information before further data processing.

The detailed rules of the right to prior information are contained in Article 13 of the Regulation.

13.3. Informing the person concerned and the information to be made available to him/her, if the personal data was not obtained from him by the data controller

13.3.1. If the data controller has not obtained the personal data from the person concerned, the data controller shall notify the person concerned within one month at the latest from the date of acquisition of the personal data; if the personal data is used for the purpose of contacting the person concerned, at least during the first contact with the data subject; or if it is expected that the data will be communicated to another recipient, at the latest when the personal data is communicated for the first time, it must be informed about the facts and information written in point 2 above, as well as the categories of the personal data concerned, as well as the source of the personal data and, where applicable, that the data whether they come from publicly available sources.

13.3.2. The additional rules are governed by the previous point 2 (Right to prior information).

The detailed rules of this information are contained in Article 14 of the Regulation.

13.4. The concerned person's right of access

13.4.1. The person concerned has the right to receive feedback from the data controller as to whether his personal data is being processed, and if such data processing is underway, he is entitled to receive access to the personal data and related information. (Regulation Article 15).

13.4.2. If personal data is transferred to a third country or to an international organization, the person concerned is entitled to receive information about the appropriate guarantees regarding the transfer according to Article 46 of the Regulation.

13.4.3. The data controller must provide the person concerned with a copy of the personal data that is the subject of data management. For additional copies requested by the data subject, the data controller may charge a reasonable fee based on administrative costs.

Detailed rules regarding the data subject's right of access are contained in Article 15 of the Regulation.

13.5. Right to rectification

13.5.1. The person concerned is entitled to have the Data Controller correct inaccurate personal data concerning him without undue delay upon request.

13.5.2. Taking into account the purpose of data management, the data subject is entitled to request the completion of incomplete personal data, including by means of a supplementary statement.

These rules are contained in Article 16 of the Regulation.

13.6. The right to deletion (“the right to be forgotten”)

13.6.1. The person concerned has the right to request that the data controller delete the personal data concerning him without undue delay, and the data controller is obliged to delete the personal data concerning the data subject without undue delay if

- a) the personal data are no longer needed for the purpose for which they were collected or otherwise processed;
- b) the person concerned withdraws the consent that forms the basis of the data management, and there is no other legal basis for the data management;
- c) the data subject objects to the processing of his data and there is no overriding legal reason for the data processing,
- d) personal data were handled unlawfully;
- e) personal data must be deleted in order to fulfil the legal obligation prescribed by EU or Member State law applicable to the data controller;
- f) the collection of personal data took place in connection with the offering of information society-related services offered directly to children.

13.6.2. The right to deletion cannot be validated if data management is necessary

- a) for the purpose of exercising the right to freedom of expression of opinion and getting information;
- b) for the purpose of fulfilling an obligation under EU or Member State law applicable to the data controller, or for the purpose of performing a task performed in the public interest or in the context of the exercise of a public authority assigned on the data controller;
- c) on the basis of public interest in the field of public health;
- d) for the purpose of archiving in the public interest, for scientific and historical research purposes or for statistical purposes, if the right to erasure would likely make this data management impossible or seriously jeopardize it, or
- e) to present, enforce and defend legal claims.

Detailed rules regarding the right to deletion are contained in Article 17 of the Regulation.

13.7. The right to restrict data processing

13.7.1. In the case of data management restrictions, such personal data may only be processed with the exception of storage, with the consent of the person concerned, or to submit, enforce or defend legal claims, or to protect the rights of another natural or legal person, or in the important public interest of the Union or a member state.

13.7.2. The person concerned has the right to request that the Data Controller restricts data processing if one of the followings is met:

- a) the person concerned disputes the accuracy of the personal data, in which case the limitation applies to the period that allows the Data Controller to check the accuracy of the personal data;
- b) the data management is illegal and the person concerned opposes the deletion of the data and instead requests the restriction of their use;

- c) the Data Controller no longer needs the personal data for the purpose of data management, but the person concerned requires them to present, enforce or defend legal claims; or
- d) the person concerned objected to data processing; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the person concerned.

13.7.3. The person concerned must be informed in advance of the lifting of the restriction of data management.

The relevant rules are contained in Article 18 of the Regulation.

13.8. Notification obligation related to the correction or deletion of personal data or the limitation of data management

The data controller informs all recipients of all corrections, deletions or data management restrictions to whom or to whom the personal data was communicated, unless this proves to be impossible or requires a disproportionately large effort. At the request of the person concerned, the data controller informs about these recipients.

These rules can be found under Article 19 of the Regulation.

13.9. The right to data transferability

13.9.1. Under the conditions set out in the Regulation, the person concerned is entitled to receive the personal data concerning him/her provided to a data controller in a segmented, widely used, machine-readable format, and is also entitled to transmit this data to another data controller without being hindered by the data controller to whom you made the personal data available, if

- a) data management is based on consent or a contract; and
- b) data management takes place in an automated manner.

13.9.2. The person concerned may request the direct transfer of personal data between data controllers.

13.9.3. The exercise of the right to data transferability should not violate Article 17 of the Regulation (The right to erasure ("the right to be forgotten"). The right to data transferability does not apply in the event that the data processing is in the public interest or is a task carried out in the context of the exercise of the public authority delegated to the data controller This right must not adversely affect the rights and freedoms of others.

The detailed rules are contained in Article 20 of the Regulation.

13.10. Right to protest

13.10.1. The person concerned has the right to object at any time to the processing of his personal data based on the public interest, performance of a public task (Article 6 (1) e)) or legitimate interest (Article 6 f)) for reasons related to his own situation, including profiling based on the aforementioned provisions too. In this case, the data

controller may not process the personal data further, unless the data controller proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the person concerned, or which are connected to the presentation, enforcement or defence of legal claims.

13.10.2. If personal data is processed for direct business acquisition, the person concerned has the right to object at any time to the processing of personal data concerning him for this purpose, including profiling, if it is related to direct business acquisition. If the person concerned objects to the processing of personal data for the purpose of direct business acquisition, then the personal data should no longer be processed for this purpose.

13.10.3. These rights must be specifically brought to the attention of the person concerned during the first contact at the latest, and the relevant information must be displayed clearly and separately from all other information.

13.10.4. The person concerned can also exercise the right to protest using automated means based on technical specifications.

13.10.5. If personal data is processed for scientific and historical research purposes or for statistical purposes, the person concerned has the right to object to the processing of personal data concerning him for reasons related to his own situation, unless the data processing is necessary for the performance of a task carried out for reasons of public interest. The relevant rules are contained in the article of the Regulation.

13.11. Automated decision-making in individual cases, including profiling

13.11.1. The person concerned has the right not to be covered by the scope of a decision based solely on automated data management, including profiling, which would have a legal effect on him or affect him to a significant extent.

13.11.2. This right does not apply if the decision:

- a) necessary for the conclusion or fulfilment of the contract between the person concerned and the data controller;
- b) it is made possible by EU or Member State law applicable to the data controller, which also establishes appropriate measures to protect the rights and freedoms and legitimate interests of the person concerned; or
- c) is based on the express consent of the person concerned

13.11.3. In the cases mentioned in points a) and c) above, the data controller is obliged to take appropriate measures to protect the rights, freedoms and legitimate interests of the person concerned, including at least the right of the person concerned to request human intervention on the part of the data controller, to express his point of view and to oppose the decision, file an objection.

Additional rules are contained in Article 22 of the Regulation.

13.12. Limitations, restrictions

The EU or Member State law applicable to the data controller or data processor may limit the scope of rights and obligations (Articles 12-22, Article 34, Article 5 of the

Regulation) through legislative measures if the restriction respects the essential content of fundamental rights and freedoms.

The terms of this restriction are contained in Article 23 of the Regulation.

13.13. Informing the person concerned about the data protection incident

13.13.1. If the data protection incident likely involves a high risk for the rights and freedoms of natural persons, the data controller must inform the people concerned about the data protection incident without undue delay. In this information, the nature of the data protection incident must be described in a clear and understandable manner, and at least the following must be disclosed:

- a) the name and contact details of the data protection officer or other contact person providing additional information;
- c) the likely consequences of the data protection incident must be described;
- d) the measures taken or planned to be taken by the data controller to remedy the data protection incident must be described, including, where appropriate, measures aimed at mitigating any adverse consequences resulting from the data protection incident.

13.13.2. The person concerned need not be informed if any of the following conditions are met:

- a) the data controller has implemented appropriate technical and organizational protection measures and these measures have been applied to the data affected by the data protection incident, in particular those measures - such as the use of classification - that would be incomprehensible to persons not authorized to access personal data;
- b) after the data protection incident, the data controller has taken additional measures to ensure that the high risk to the rights and freedoms of the data subject is unlikely to materialize in the future;
- c) providing information would require a disproportionate effort. In such cases, the data subjects must be informed through publicly published information, or a similar measure must be taken that ensures similarly effective information to the persons concerned.

Additional rules are contained in Article 34 of the Regulation.

13.14. The right to complain to the supervisory authority (right to an official legal remedy)

The person concerned has the right to file a complaint at a supervisory authority - in particular in the Member State of his or her usual place of residence, workplace or the place of the alleged infringement - if, in the opinion of the person concerned, the processing of personal data relating to him/her is violated by the Regulation. The supervisory authority to which the complaint was submitted is obliged to inform the customer about the procedural developments related to the complaint and its outcome, including whether the customer is entitled to legal remedies.

These rules are contained in Article 77 of the Regulation.

13.15. Right to an effective judicial remedy against the supervisory authority

13.15.1. Without prejudice to other administrative or non-judicial remedies, all natural and legal persons are entitled to an effective judicial remedy against the legally binding decision of the supervisory authority.

13.15.2. Without the provision of other administrative or non-judicial legal remedies, all persons concerned are entitled to effective judicial remedies if the competent supervisory authority does not deal with the complaint or does not inform the person concerned within three months about the procedural developments related to the submitted complaint or its results.

13.15.3. Proceedings against the supervisory authority must be initiated before the court of the Member State where the supervisory authority is based.

13.15.4. If proceedings are initiated against a decision of the supervisory authority in relation to which the Board previously issued an opinion or made a decision within the framework of the uniformity mechanism, the supervisory authority is obliged to send this opinion or decision to the court.

These rules are contained in Article 78 of the Regulation.

13.16. Right to an effective judicial remedy against the data controller or data processor

13.16.1. Without prejudice to the available administrative or non-judicial legal remedies, including the right to file a complaint with the supervisory authority, each person concerned is entitled to an effective judicial remedy if, in his opinion, his rights according to this regulation have been violated as a result of the processing of his personal data not in accordance with this regulation.

13.16.2. Proceedings against the data controller or data processor must be initiated in front of the court of the Member State where the data controller or data processor operates. Such a procedure can also be initiated in front of the court of the Member State of the habitual residence of the person concerned, unless the data controller or the data processor is a public authority of a Member State acting in the capacity of public authority.

These rules are contained in Article 79 of the Regulation.

Dated: Budapest, April 26th, 2023.

Mr. Zoltán Fábán
managing director
S.C.