

IVM Zrt.

Data Protection Policy

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1. INTRODUCTION

IVM Zrt. (hereinafter referred to as: Service provider, Data Controller, controller) hereby accepts the the binding nature of the provision herein, both internally and externally:

Based on REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, we hereby share the following notification.

The present data protection policy governs the data controlling of the following webpages: ivm-vendin.eu and medical-vending.com

The full data protection policy is available at: ivm-vending.eu and [medical-vending](http://medical-vending.com)

Any modification of the policy take effect upon being uploaded to the link specified above.

1.1. DATA CONTROLLER CONTACT :

Name: IVM Zrt.

Headquarters: And IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,

Tax code: 23003097-2-07

Registration number: Cg.07-10-001386

E-mail: gdpr@ivm.hu

Phone: +36 (30) 335-7-335

1.2. DATA PROTECTION OFFICER CONTACT

Name: Péter Krajcsovics

Headquarters: Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary

E-mail: peter.krajcsovics@ivm.hu

Phone: +36309819175

2. DEFINITIONS

1. '*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
2. '*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
3. '*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;
4. '*processor*' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
5. '*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;
6. '*consent*' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
7. '*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;

3. PRINCIPLES RELATING TO THE PROCESSION OF PERSONAL DATA

Personal data shall be:

- a) kezelését jogszerűen és tisztességesen, valamint az érintett számára átlátható módon kell végezni („jogszerűség, tisztességes eljárás és átláthatóság”);
- b) processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- c) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes (‘purpose limitation’);
- d) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- e) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
- f) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (‘storage limitation’);
- g) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

The controller shall be responsible for, and be able to demonstrate compliance with the principles described above (‘*accountability*’).

Controller declares that all undertaken data processing adheres to the principles.

4. SPECIFIC PROVISIONS

4.1. REGISTRATION (CREATING A USER ACCOUNT)

1. Existence of data controlling, scope of controlled data and the **purpose of data controlling**:

Personal data	Purpose of data processing
Surname, first name	Identification enables secured access to the user account.
Email address	General contact, receiving system messages, access to user account
Phone	Identification, general contact
Password	Enables secured access to the user account.
Billing name and address	Required by law in order for the controller to be able to submit invoices according to the regulations, for entering into an agreement for monitoring incoming payments and performance according to contractual obligations., billing costs arising from contracts and dept collection.
Shipping name and address	For product shipping.
Additional data	For making the service more efficient
Registration date	For technical operations
IP address used during registration	For technical operations

The email address might neccessarily not contain personal data.

2. **Data subjects:** all who register on the webpage
3. **Data processing period, deadline for erasure:** If any conditions of Article 17, (1) , of the GDPR are met, the processing period ends upon complying with the data subject's request for erasure. By deleting the registration, the related personal data is erased as well. Upon erasing any of the data subject's personal data, data controller notifies data subject electronically according to the requirements of Article 19 of the GDPR. If the erasure request covers the email address as well, the address shall be erased immediately after the notification email is successfully sent.
4. **Potential data controlling persons, potential recipients:** Personal data shall exclusively be accessed and processed by the appointed employees of the data controller and according to the terms and conditions herein.
5. **Notifying data subjects of their rights:**

- Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
- Shall have the right for data portability, and furthermore to withdraw consent at any time.

6. Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:

By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,
Via email: gdpr@ivm.hu
Via phone: +36 (30) 335-7-335

7. Lawfulness of processing: Article 6. (1) a) and b) of the GDPR

8. We hereby notify you, that

- Data processing is due to **your consent, and is necessary for the steps preceding signing of an agreement as requested by you.**
- **Are required** to provide you personal data in order to register
- Failure to provide you personal data results in an incomplete registration, in which case a user account cannot be created.

4.2. DATA PROCESSING THROUGH THE CAREER PAGE

1. Existence of data controlling, scope of controlled data and the purpose of data controlling:

Personal data	Purpose of data processing
First and surname	Contact
Email address	Contact
Phone number	Contact
Date of birth	Identification
Net salary requirements	Required for evaluating the application
Professional experience	Required for evaluating the application
IP address used during registration	For technical operations
Hobbies	Required for evaluating the application
CV	Required for evaluating the application

2. **Data subjects:** those who submit an application via the career page
3. **Data processing period, deadline for erasure:** If any conditions of Article 17, (1), of the GDPR are met, the processing period ends upon complying with the data subject's request for erasure. By deleting the registration, the related personal data is erased as well. Upon erasing any of the data subject's personal data, data controller notifies data subject electronically according to the requirements of Article 19 of the GDPR. If the erasure request covers the email address as well, the address shall be erased immediately after the notification email is successfully sent. These provision do not apply for accounting receipts, which are, according to the regulations of Law C. of 2000 on accounting, Article 169. (2) must be stored for 8 years. Personal data of the subject can be erased upon request once the civil law limitation period passes. If the evaluation is not successful and/or the data subject does not enter into employment with IVM Zrt., unless data subject explicitly requests immediate erasure, the data shall be stored for 1 year and utilized exclusively for contact about potential openings.
4. **Potential data controlling persons, potential recipients:** Personal data shall exclusively be accessed and processed by the appointed employees and data processors of the data controller and according to the terms and conditions herein.
5. **Notifying data subjects of their rights:**
 - Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
 - Shall have the right for data portability, and furthermore to withdraw consent at any time.
6. **Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:**

By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,

Via email: hr@ivm.hu

7. **Lawfulness of processing:** Article 6. (1) a) and b) of the GDPR

8. We hereby notify you, that

- Data processing is due to **your consent, and is necessary for evaluation of your application.**
- **Are required** to provide you personal data in order to apply for the job.
- Failure to provide you personal data results in an incomplete application, in which case we cannot evaluate you.

4.3.OFFER REQUEST

1. Existence of data controlling, scope of controlled data and the purpose of data controlling:

Personal data	Purpose of data processing
Name	Identification
Phone number	Contact
Email address	Contact and reply to offer request
Message	Necessary for context, additional information, to personalize the offer
Company name (not personal data)	Contact
Position	Necessary for context, additional information, to personalize the offer
Request data	For technical operations
IP address used during request	For technical operations
Country	Necessary for context, additional information, to personalize the offer
Marketing channels (not personal data)	Required for marketing efficiency evaluation

The email address might neccessarily not contain personal data.

2. **Data subjects:** those who submit a request for offer via the webpage

3. **Data processing period, deadline for erasure:** If any conditions of Article 17, (1), of the GDPR are met, the processing period ends upon complying with the data subject's request for erasure. If no contractual agreement is signed by the parties, data is stored for a 1-year period. By deleting the registration, the related personal data is erased as well. Upon erasing any of the data subject's personal data, data controller notifies data subject electronically according to the requirements of Article 19 of the GDPR. If the erasure request covers the email address as well, the address shall be erased immediately after the notification email is successfully sent.

4. **Potential data controlling persons, potential recipients:** Personal data shall exclusively be accessed and processed by the appointed employees and data processors of the data controller and according to the terms and conditions herein.

5. **Notifying data subjects of their rights:**

- Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
- Shall have the right for data portability, and furthermore to withdraw consent at any time.

6. **Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:**

By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,
Via email: hr@ivm.hu

7. **Lawfulness of processing:** Article 6. (1) a) and b) of the GDPR

8. We hereby notify you, that

- Data processing is due to **your consent, and is necessary for replying to your offer request**
- **Are required** to provide you personal data in order for us to be able to reply.
- Failure to provide you personal data results in an incomplete request, in which case we cannot reply with an offer.

4.4. CUSTOMER RESERVATION

1. Existence of data controlling, scope of controlled data and the purpose of data controlling:

The customer reservation form enables Data Collector partners to register customer, and to have exclusive offering rights for a given period against other distributors and IVM Zrt. The data and consent of the data subject shall be acquired by the Data Collector. For the purposes of the present clause (4.4), IVM Zrt. is a data processor only.

Personal data	Purpose of data processing
Partner email address	Identification
Customer name (if not company name)	Identification
Customer phone number	Identification, contact
Customer email address	Identification, contact
Customer contact person name	Identification, contact
Country, address	Identification

The email address might neccessarily not contain personal data. Other required data on the form are not considered personal data (for example, registration time)

2. **Data subjects:** Data Controllers filling out the form and the registered customers
3. **Data processing period, deadline for erasure:** If any conditions of Article 17, (1), of the GDPR are met, the processing period ends upon complying with the data subject’s request for erasure, or up to 1 year from the registration. By deleting the registration, the related personal data is erased as well. Upon erasing any of the data subject’s personal data, data controller notifies data subject electronically according to the requirements of Article 19 of the GDPR. If the erasure request covers the email address as well, the address shall be erased immediately after the notification email is successfully sent.
4. **Potential data controlling persons, potential recipients:** Personal data shall exclusively be accessed and processed by the appointed employees and data processors of the data controller and according to the terms and conditions herein.
5. **Notifying data subjects of their rights:**
 - Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
 - Shall have the right for data portability, and furthermore to withdraw consent at any time.
6. **Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:**

By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,
Via email: hr@ivm.hu

7. **Lawfulness of processing:** Article 6. (1) a) and b) of the GDPR

8. We hereby notify you, that

- Data processing is due to **your consent, and is necessary for customer reservation.**
- **Are required** to enable us to register your customer.
- Failure to provide you personal data results in an incomplete request, in which case we cannot reserve the customer.

4.5. CONTACT REQUEST

1. Existence of data controlling, scope of controlled data and the purpose of data controlling:

Personal data	Purpose of data processing
Name	Identification
Email address	Contact and reply to request
Message	Necessary for context, additional information, to personalize the reply
Time of request	For technical operations.

The email address might neccessarily not contain personal data.

2. **Data subjects:** those who submit a contact request form

3. **Data processing period, deadline for erasure:** If any conditions of Article 17, (1), of the GDPR are met, the processing period ends upon complying with the data subject's request for erasure. If no contractual agreement is signed by the parties, data is stored for a 1-year period.

4. **Potential data controlling persons, potential recipients:** Personal data shall exclusively be accessed and processed by the appointed employees and data processors of the data controller and according to the terms and conditions herein.

5. **Notifying data subjects of their rights:**

- Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
- Shall have the right for data portability, and furthermore to withdraw consent at any time.

6. **Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:**

By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,
Via email: hr@ivm.hu

7. **Lawfulness of processing:** Article 6. (1) a) and b) of the GDPR. By filling out the contact request form, Data Subject consents to the processing of his data according to the terms and conditions herein.
8. We hereby notify you, that
 - Data processing is due to **your consent, and is necessary for replying to your contact request**
 - **Are required** to provide you personal data in order for us to able to reply.
 - Failure to provide you personal data results in an incomplete request, in which case we cannot reply to your request.

4.6. CUSTOMER CONTACT INFO

1. Existence of data controlling, scope of controlled data and the purpose of data controlling:

Personal data	Purpose of data processing
Name, email address, phone number	Identification, contact, preceding steps to contractual agreement, fulfilling contract obligations.

2. **Data subjects:** those who are in contact with IVM Zrt. personally/via email/via phone and all those whose personal data is included in contractual agreements.
3. **Data processing period, deadline for erasure:** If any conditions of Article 17, (1), of the GDPR are met, the processing period ends upon complying with the data subject's request for erasure. By deleting the registration, the related personal data is erased as well. Upon erasing any of the data subject's personal data, data controller notifies data subject electronically according to the requirements of Article 19 of the GDPR. If the erasure request covers the email address as well, the address shall be erased immediately after the notification email is successfully sent. These provision do not apply for accounting receipts, which are, according to the regulations of Law C. of 2000 on accounting, Article 169. (2) must be stored for 8 years. Personal data of the subject can be erased upon request once the civil law limitation period passes. If the evaluation is not successful and/or the data subject does not enter into employment with IVM Zrt., unless data subject explicitly requests immediate erasure, the data shall be stored for 2 years and utilized exclusively for contact about potential openings.
4. **Potential data controlling persons, potential recipients:** Personal data shall exclusively be accessed and processed by the appointed employees and data processors of the data controller and according to the terms and conditions herein.
5. **Notifying data subjects of their rights:**
 - Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
 - Shall have the right for data portability, and furthermore to withdraw consent at any time.
6. **Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:**

By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,
Via email: hr@ivm.hu

7. **Lawfulness of processing:**
 - 7.1. Article 6. (1) a) and b) of the GDPR
 - 7.2. Limitation period – statute of limitations from the Hungarian Civil Code 6:22. § [Statute of limitations]

- (1) Unless this law prescribes otherwise, claims are limited to a 5 year period.
- (2) Limitation period begins upon due date.
- (3) Any agreements modifying the limitation period must be in writing.
- (4) Agreement voiding the limitation period are invalid.

8. We hereby notify you, that

- Data processing is due to **your consent, and is necessary keeping in touch with our customers**
- **Are required** to provide you personal data in order for us to be able to reply and keep contact, furthermore to fulfill our contractual obligations towards your company

4.7. NEWSLETTER, DM ACTIVITIES

1. According to Law on commercial advertising activities of 2008. XLVIII, art. 6. The User retains the right to provide prior and explicit consent for the Service provider (IVM Zrt.) to utilize the contact as a means of sharing advertisement and other related marketing materials.
2. Furthermore, the User has the right to consent to Service provider processing his data for the purposes of these marketing activities.
3. The Service provider shall not send unrelated offer and User retains the unrestricted right to unsubscribe from the marketing messages. In this case, Service provider shall erase all personal data stored in connection with the marketing activities and shall not contact the User with advertisements in the future. The method of unsubscribing is provided via a link in the footer of each marketing message.
9. Existence of data controlling, scope of controlled data and the purpose of data controlling:

Személyes adat	Az adatkezelés célja
Name, email address	Identification, subscribing to newsletter
Subscribe date	For technical operations
IP address used to subscribe	For technical operations

4. **Data subjects:** all who subscribe to the newsletter
5. **Purpose of data collection:** to send electronic messages (email, sms, push) containing advertisement and marketing materials, news and information related to current activities, sales, new features, etc.
6. **Data processing period, deadline for erasure:** data is stored until User unsubscribes from the service

7. **Potential data controlling persons, potential recipients:** Personal data shall exclusively be accessed and processed by the appointed employees and data processors of the data controller and according to the terms and conditions herein.

8. Notifying data subjects of their rights:
 - a. Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
 - b. Shall have the right for data portability, and furthermore to withdraw consent at any time.

9. Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:
 - a. By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,
 - b. Via email: hr@ivm.hu

10. Data subjects retain the right to unsubscribe from the newsletter, at any time.

11. **Lawfulness of processing:** consent of the data subject, according to Article 6. (1) a) and b) of the GDPR, and Law on commercial advertising activities of 2008. XLVIII, art. 6.

12. We hereby notify you
 - **Data processing is based on Your consent and the legitimate interest of the service provider.**
 - **Are required** to provide personal data in order to subscribe to the service
 - **If you do not provide your data,** we are unable to subscribe you to the service
 - You have the unrestricted right to withdraw your consent at all times.

4.8. VOICEMAIL

1. Existence of data controlling, scope of controlled data and the purpose of data controlling: First and surname, voice of the data subject, topic of conversation, phone number, email address, other personal data.
2. Data subjects: All who contact Data Controller via phone.
3. Purpose of data processing: IVM Zrt. stores and processes data to document incoming calls, to measure customer satisfaction, to effectively handle error reports and complaints.
4. Data processing period, deadline for erasure: Data is processed until the contractual relationship between the Parties expires, or in case of any outstanding claims, until a 5 year period after expiration (statute of limitations).
5. Potential data controlling persons, potential recipients: Personal data shall exclusively be accessed and processed by the appointed employees and according to the terms and conditions herein
6. Processing the personal data: The records are only accessed and played back upon any claims being settled or upon incoming complaints from customers.
7. **Notifying data subjects of their rights:**
 - Data subjects shall have the right to request from data controller access to his personal data, modification, erasure of said data or the limitation of processing, and
 - Shall have the right for data portability, and furthermore to withdraw consent at any time.
8. **Data subject can request access, modification, erasure, limitation of processing and portability through the following contacts:**

By post: IVM Zrt., Building 22, 72-100, Berényi út, Székesfehérvár, 8000, Hungary,
Via email: hr@ivm.hu
9. Lawfulness of processing:
 - 9.1. Article 6. (1) a) and b) of the GDPR
 - 9.2. Limitation period – statute of limitations from the Hungarian Civil Code 6:22. § [Statute of limitations]
 - (1) Unless this law prescribes otherwise, claims are limited to a 5 year period.
 - (2) Limitation period begins upon due date.
 - (3) Any agreements modifying the limitation period must be in writing.
 - (4) Agreement voiding the limitation period are invalid.
9. Additional voicemail related information

- At the start of the conversation, IVM Zrt. employees notify the data subject of the Data Collector's person, the fact that a recording is taking place and the webpage where the data protection rules are publicly available.
- IVM Zrt. enables the data subject, upon specific request, to have the recorded conversation played back to him and to hand over a copy, in accordance with the recommendation 213/H/2009 of the Data Protection Commissioner.
- IVM Zrt. also provides a contact channel via email, where no voice recording shall take place.

5. RECIPIENTS OF PERSONAL DATA

5.1. DATA PROCESSORS (WHO PROCESS DATA ON BEHALF OF THE CONTROLLER)

In order to support its data processing activities, and to satisfy contractual obligations with the data subject and obligation prescribed by law, the Data Controller employs data processors.

Data Controller exclusively cooperates with data processor, who are able to provide satisfactory guarantees that the processing complies with GDPR regulations and is done with a technical and organizing conditions that enable the satisfactory protection of the rights of the data subjects.

The data processors, and any entity under control or ordered by data processors or Data Controller who have access to the personal data specified herein shall exclusively process according to the instructions of the Data Controller.

Data Controller is liable for the conduct of the data processor. The data processor shall only be held liable if it failed to comply with the obligation of data processors prescribed by GDPR or acted contrary of or disregarded the Data Controllers instructions.

The data processor shall have no material decision making right over the data.

Data Controller employs a web hosting provider as a data processor for the operation of the webpage.

5.2. DATA PROCESSORS

5.2.1. Web hosting provider

1. Activities undertaken by Data Processor: web-hosting
2. Data Processor name and contact:

Company name: MAXER Hosting Kft.
Address: 21 Kresz G. str., Budapest, 1131, HUNGARY
Contact: info@maxer.hu, +3612579913

Company name: Szivárványnet Kft.
Address: 101. Berényi rd. , Székesfehérvár, 8000, HUNGARY
Contact: +36 (22) 506-555, +36 (20) 437-9163, +36 (70) 652-0181, +36 (20) 585-4988; e-mail: iroda@szivarvanynet.hu; info@szivarvanynet.hu

3. Existence of data controlling, scope of controlled data and the purpose of data controlling: all personal data provided by the data subjects.
4. Data subjects: All data subjects accessing the webpage.

5. Purpose of data processing: Enabling the normal operation of the webpage.
6. Data processing period, deadline for erasure: Until the termination of the contractual relationship between the Data Controller and the Data Processor, or until Data Subject requests erasure from the Data Processor.
7. Lawfulness of processing: GDPR Article 6. (1), clause f), and Article 13/A, clause (3) of Law of 2001. CVIII on electronic marketing activities and information society.
8. Rights of the data subject:
 - a. You can request information about the processing methods.
 - b. You have the right to request information about the data collector whether your personal data is being processed, and to have access to all information related the processing.
 - c. You have the right to request the delivery of a copy of all your stored personal data in an understandable, articulate manner in files accessible via normal computers.
 - d. You have the right to request the modification of your personal data, a request to which data collector should comply without undue delay.
 - e. You have the right to protest against the processing of your data.

5.2.2. Webpage operations

1. Activities undertaken by Data Processor: webpage operations (monitoring, technical upgrades, security protocols, other developments, debugging)
2. Data Processor name and contact:

Name: Kocsis Attila e.v.
Address: 46 Albert str. Budapest, 1116 HUNGARY
E-mail: kocsisattila30@gmail.com
3. Existence of data controlling, scope of controlled data and the purpose of data controlling: All personal data provided by the data subject.
4. Data subjects: All who access or register to the webpage.
5. Purpose of data controlling: webpage operations (development, monitoring, error handling)
6. Data processing period, deadline for erasure: Until the termination of the contractual relationship between the Data Controller and the Data Processor, or until Data Subject requests erasure from the Data Processor.
9. Lawfulness of processing: GDPR Article 6. (1), clause f), and Article 13/A, clause (3) of Law of 2001. CVIII on electronic marketing activities and information society.
10. Rights of the data subject:
 - a. You can request information about the processing methods.
 - b. You have the right to request information about the data collector whether your personal data is being processed, and to have access to all information related the processing.
 - c. You have the right to request the delivery of a copy of all your stored personal data in an understandable, articulate manner in files accessible via normal computers.
 - d. You have the right to request the modification of your personal data, a request to which data collector should comply without undue delay.
 - e. You have the right to protest against the processing of your data.

5.2.3. Marketing activities

1. Activities undertaken by Data Processor: marketing activities
2. Data Processor name and contact:

Name: Nagy Andrea Éva e.v.
Address: 2, Hársfa str. Bag, 2191, HUNGARY
Email: andrea.eva.nagy@ivm.hu

Name: Tóth Réka e.v.
Address: 27 Mikszáth str, Palotás, 3042, HUNGARY
Email: reka.toth@ivm.hu

Name: Mailchimp (The Rocket Science Group, LLC,)
HQ: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA

3. Existence of data controlling, scope of controlled data: Name, email address, access information
4. Data subjects: All who access the webpage or subscribe to the newsletter
5. Purpose of data processing: Marketing activities connected to the products of the Data Collector, generating traffic for the webpage
7. Data processing period, deadline for erasure: Until the termination of the contractual relationship between the Data Controller and the Data Processor, or until Data Subject requests erasure from the Data Processor.
11. Lawfulness of processing: GDPR Article 6. (1), clause f), , Law of 2011, CXII on data protection Article 5., and Article 13/A, clause (3) of Law of 2001. CVIII on electronic marketing activities and information society.
12. Rights of the data subject:
 - a. You can request information about the processing methods.
 - b. You have the right to request information about the data collector whether your personal data is being processed, and to have access to all information related the processing.
 - c. You have the right to request the delivery of a copy of all your stored personal data in an understandable, articulate manner in files accessible via normal computers.
 - d. You have the right to request the modification of your personal data, a request to which data collector should comply without undue delay.
 - e. You have the right to protest against the processing of your data.

DATA TRANSFER TO THIRD PARTIES

6. COOKIE MANAGEMENT

1. Our webpage operates ‘password protected session cookies’, ‘security cookies’, ‘session cookies’, ‘functional cookies’, webpage analytics cookies’, the using of which does not require user consent.
2. Existence of data controlling, scope of controlled data: Unique id, dates, times
3. Data subjects: all who access the webpage.
4. Purpose of data processing: identifying users, monitoring webpage activities
5. Data processing period, deadline for erasure:

Cookie type	Lawfulness	Data processing period	Scope
Session cookies	Article 13/A, clause (3) of Law of 2001. CVIII on electronic marketing activities and information society	End of user session	connect.sid
Permanent cookies	Article 13/A, clause (3) of Law of 2001. CVIII on electronic marketing activities and information society	Until erasure	
Statistics cookies	Article 13/A, clause (3) of Law of 2001. CVIII on electronic marketing activities and information society	1-2 months	

6. Potential data controlling persons, potential recipients: The cookies do not store personal data.

7. Notifying data subjects of their rights: Data Subjects have the option to delete the cookies in their browser, usually located at Tools/Settings menu, under data protection.
8. Lawfulness of data processing: No consent of the data subject is required, if the exclusive purpose of the cookies is to transmit communications on electronic communication networks, or if the cookies are required for the service provider to operate the informational technology related services requested by the user.
9. Most browsers allow the user to set which cookies are to saved after a session, and which are to be deleted regularly. If You restrict cookie management on wepages or block third-party cookies, this could result in some parts of our webpage not to function as intended. You can find more information about cookie management and customization through the following links:

Google Chrome (<https://support.google.com/chrome/answer/95647?hl=hu>)

Internet Explorer (<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>)

Firefox (<https://support.mozilla.org/hu/kb/sutik-engedelyezese-es-tiltasa-amit-weboldak-haszn>)

Safari (https://support.apple.com/kb/PH21411?locale=hu_HU)

7. GOOGLE AND FACEBOOK SERVICES

7.1. GOOGLE ADWORDS KONVERZIÓKÖVETÉS HASZNÁLATA

1. The 'Google AdWords' online marketing application is used by the Data Controller alongside its conversion tracking service. The tracking service is an analytic tool provided by Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; „Google“).
2. Once a User accesses the webpage through a Google-advertisement, a conversion tracking cookie is saved onto the computer. The validity of this cookie is limited and it does not contain any personal data, thus the user is not identifiable through the tracking.
3. If the cookie is still valid, and the user accesses certain menus of the webpage, both Google and Data Controller receive information about the fact that page was accessed through the advertisement.
4. All Google AdWords user receive a unique cookie, thus these cannot be tracked though their own webpage.
5. The information acquired by using the conversion tracking cookie serve the purpose of creating conversion statistics about the customers, enabling the Data Controller to have an insight into customer access and pages visited. However, no information is received that can be traced back to the individual user.
6. If you wish to opt out from conversion tracking, you can disable cookie installation in your browser. Doing so will eliminate your activities from conversion statistics.
7. For more information and Google privacy policy: www.google.de/policies/privacy/

7.2. GOOGLE ANALYTICS

1. This webpage operates Google Analytics application, a webpage analyzing service offered by Google Inc. („Google”). This process installs cookie to the computer of the user, enabling statistical analysis of webpages accessed by the user.
2. Data created by cookies is usually stored in one of servers of Google in the USA. By using IP anonymity, Google shortens the IP address of the user prior to transmitting outside the EU or EEEA.
3. The transmitting of the full IP to the Google servers in the US is done in special cases only. Based on the request of the operator of this webpage, Google will use the collected information to analyze how the user accessed the webpage, and to offer additional services related to the webpage and internet usage.
4. Through Google Analytics, Google does not match the transmitted IP with other user information stored by Google. Most browsers allow the user to set which cookies are to saved after a session, and which are to be deleted regularly. If You restrict cookie management on wepages or block third-party cookies, this could result in some parts of our webpage not to function as intended. You also have the option to block Google from collecting and processing information (including IP address) via cookies, if you download and install the following plugin <https://tools.google.com/dlpage/gaoptout?hl=hu>

7.3. FACEBOOK PIXEL

1. Facebook pixel is a code, utilized to create detailed reports about conversions, target audiences, and enables the webpage operator to receive access information. By using the Facebook remarketing pixel tracking code, those who accessed the webpage can receive personalized advertisements on their Facebook page. The remarketing list cannot be used to identify users individually. For more information, visit : <https://www.facebook.com/business/help/651294705016616>

7.4. SOCIAL MEDIA

1. Existance of data controlling, scope of controlled data: Facebook/Google+/Twitter/Pinterest/Youtube/Instagram/LinkedIn/Xing pages – user name, public profile picture.
2. Data subjects: All who are registered users on a Facebook/Google+/Twitter/Pinterest/Youtube/Instagram/LinkedIn/Xing and have ‘liked’ or followed the social media page of IVM Zrt or have contacted the company via one of the platforms.

3. Purpose of data processing: Sharing marketing content on the platforms, sending information about the contents of the webpage, generating 'likes' and traffic generation.
4. Data processing period, deadline for erasure, potential data controlling persons, potential recipients: Data processing methods, deadlines, controller and processor are different for each social media platform. User can receive more information by visiting the specific website. The data controlling is done through the social media pages, and as such, all deadlines and user request must be done through these service providers.
5. Lawfulness of processing: consent of the data subject through the social media platform.

8. CUSTOMER CONTACT AND OTHER DATA PROCESSING

1. Should any questions arise or problems emerge during the performance of services offered, the customer can contact the Data Controller via the communication channels (phone, email, social media pages) listed on the website.
2. The Data Controller stores the received personal data, - specifically the name and email address, and other voluntarily shared data of the sender - from the emails, messages, phone calls, social media platforms for up to 2 years from the contact, after which the data shall be erased.
3. Data subject shall be notified of the rules of any data process, that are not listed in this document, prior to providing their personal data.
4. Upon data protection agency inquiries or other situation when prescribed by law, the Data Controller is compelled to share, hand over or transmit the data to the authorities.
5. In such cases, Data Controller shall only allow access for the authority after the exact purpose and data scope is defined, and only to the extent required to comply with the request.

9. RIGHTS OF THE DATA SUBJECTS

1. Right of access

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

2. Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where the conditions listed in the GDPR are fulfilled.

4. Right to be forgotten

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

5. Right to restrict processing

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

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject

6. Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and

machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, in the cases listed by the GDPR.

7. **Right to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the GDPR provisions, including profiling.

8. **Right to object against direct marketing**

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

9. **Automated individual decision-making, including profiling**

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This provision cannot be applied, if the decision

- is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- is based on the data subject's explicit consent.

10. **DEADLINE FOR MEASURES**

The Data Controller shall provide information on action taken on a request to the data subject without undue delay and in any event within **one month** of receipt of the request.

That period may be extended by **two further months** where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension **within one month** of receipt of the request, together with the reasons for the delay.

If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

11. 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:

- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
- e) In assessing the appropriate level of security account shall be taken in particular of the risks of unauthorized access by an appropriate storage system in case of paper-based data, and network restrictions in case of electronically stored data.
- f) When storing data electronically a method shall be selected where the controller can fully comply – within the deadling - with any erasure requests or other instructions that result in erasure. The erased data must be wiped irrecoverably.
- g) Paper based data shall be erased by shredder or by employing a specialized subcontractor. For electronic storage, the rules and procedures for the physical destruction of such electronic equipment must be followed, and where necessary, data shall be wiped before, in a secure and irrecoverable way.
- h) Data Controller shall also undertake the following measures:
 - a. For the protection of paper based data, the following measures are taken (*physical protection*):
 - i. The documents are stored in a secure, locked and dry room.
 - ii. The building of the data controller is equipped with the necessary security and fire prevention tools.
 - iii. Personal data shall only be accessed by authrozied personnel, no third party shall have access.
 - iv. Employees of the data controller processing the data shall only leave the room if the storing device in his care is locked securely or the room is locked upon exiting.
 - v. If paper based documents are digitalized, the procedure rules for digital data must be followed.

b. IT protection

- i. The computers and mobil devices (other storage devices) used for data processing are all in possession of the Data Controller.
- ii. Data on computers can only be accessed with a username and password.
- iii. The server can only be accessed by authorized specialist with the necessary authorization.
- iv. To better protect digitally stored data, Date Controller implement regular backups and archives.
- v. All IT system used by the Data Controller have the necessary anti-virus software installed.

12. COMMUNICATION OF A PERSONAL DATA BREACH TO THE DATA SUBJECT

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

The communication to the data subject shall describe in **clear and plain language** the nature of the personal data breach and contain at least 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; and shall 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 referred to in paragraph 1 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.

13. NOTIFICATION OF A PERSONAL DATA BREACH TO THE SUPERVISORY AUTHORITY

In the case of a personal data breach, the controller shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

14. SUPERVISORY AUTHORITY

Upon possible data right violation by the Data Controller, the data subject shall have the right to report the violation to the national data protection agency (Nemzeti Adatvédelmi és Információszabadság Hatóság):

Nemzeti Adatvédelmi és Információszabadság Hatóság
22/C Szilágyi Erzsébet fasor, Budapest, 1125, HUNGARY.
Mailbox: 1530 Budapest, mailbox 5.
Phone: +36 -1-391-1400
Fax: +36-1-391-1410
E-mail: ugyfelszolgalat@naih.hu

15. CLOSING REMARKS

During writing this policy, the following laws and regulations were considered: a:

- 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 or GDPR)
- Law CXII of 2011 on Informational Self-Determination and Freedom of Information (Privacy Act)
- Law CVII of 2001. On electronic marketing services and services related to the informational society
- Law XLVII. Of 2008 on banning unfair market practices against consumers
- Law XLVIII. Of 2008 on general conditions and scope of advertisement activities
- Law XC of 2005. On electronic freedom of information
- Law C of 2003. On electronic communications
- 16/2011. EASA/IAB recommendation about behavior based online marketing practices
- Recommendations of NAIH on prior notifications about data protection

2018.06.14

IVM Zrt.