

GENERAL INFORMATION NOTE ON DATA PROTECTION

1. General

1.1 Introduction

PARAINESIS Kereskedelmi és Szolgáltató Kft. (hereinafter called Parainesis Kft. or Controller or Employer) considers highly important to respect the right related to processing data of its customers and all other data subject natural persons and their right to exert. While handling personal data of its customers, Parainesis Kft. acts in accordance with General Data Protection Regulation (GDPR) of the European Union and the Act CXII of 2011 on the right of information self-determination and on the information liberty as well as other legislation related to data protection.

1.2 Definitions

The expressions often occurring in the information note on data protection bear the following meaning:

‘personal data’: 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; **‘controller’**: 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; **‘processor’**: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

‘processing’: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; **‘data processing’**: carrying out tasks of technical, technological type in relation to processing actions (e.g. arrangement into a worksheet, etc.) irrespective of the method and device applied to carry out the actions as well as the place of carrying out the action; **‘recipient’**: 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;

‘consent of the data subject’: any freely given, specific, informed and unambiguous indication of the wishes of the data subject by which he/she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him/her; **‘personal data breach’**: 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; **‘objection’**: statement of the data subject in any form (e.g. in written, verbal or email form) in which he/she complains of the processing of his/her personal data and requests the elimination of processing and the erasure of processed data; **‘restriction of processing’**: the marking of stored personal data with the aim of limiting their processing in the future;

1.3 Name of the Controller

Name: **PARAINESIS Kereskedelmi és Szolgáltató Kft.**

Address: **Győrújbarát, Kákostó u. 7.**

Email address: **adatkezeles@parainesis.hu**

1.4 Security of processing

Parainesis Kft. takes care of the security of the data, carries out the technical and organisational actions and establishes the procedural rules that are necessary GDPR to be exerted. Parainesis Kft. protects data using the appropriate actions, in particular the unauthorised access, alteration, transmission, disclosure, erasure or destruction as well as accidental deterioration or damage, furthermore becoming inaccessible due to the change in the applied technique.

2. Information on the rights exercised by the data subjects

2.1 Right to have prior information

The data subject shall have the right to receive information on the facts and pieces of information related to the processing prior to the start of processing.

2.2 Right to access of the data subject

The data subject shall have the right to receive a feedback from the Controller concerning whether his/her personal data are being processed or not and if they are being processed, he/she shall have the right to obtain access to the personal data and information in connection with the regulation.

2.3 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/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.

2.4 Right to erasure ('right to be forgotten')

The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him/her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies.

2.5 Right to restriction of processing

The data subject shall have the right to obtain from the Controller restriction of processing where the conditions laid out in the regulation apply.

2.6 Notification obligation regarding rectification or erasure of personal data or restriction of processing

The Controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.

2.7 Right to data portability

The data subject shall have the right to receive the personal data concerning him/her, which he/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.

2.8 Right to object

The data subject shall have the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data concerning him/her which is based on point (e) of Article 6 (1) of GDPR (the processing of data is necessary in the public interest or in the exercise of an official authority vested in the Controller) or point (f) (the processing of data is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party).

2.9 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/her or similarly significantly affects him/her.

2.10 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.

2.11 Right to lodge a complaint with a supervisory authority (right to have a judicial remedy before an authority)

Every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his/her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him/her infringes this Regulation.

subject considers that the processing of personal data relating to him/her infringes this Regulation.

2.12 Right to an effective judicial remedy against a supervisory authority

Each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them or where the supervisory authority which is competent does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

2.13 Right to an effective judicial remedy against a controller or processor

Each data subject shall have the right to an effective judicial remedy where he/she considers that his/her rights under this Regulation have been infringed as a result of the processing of his/her personal data in non-compliance with this Regulation.

3. Information note on processing

3.1 Information note on personal data processing of contractual partners, customers and their natural person representatives

PARAINESIS Kft. processes the data of natural persons contracted with it as its clients and/or suppliers for the purposes under the legal title of concluding, performing a contract, providing a contractual discount. This processing is deemed lawful even if the processing requires certain steps by the request of the data subject prior to the conclusion of the contract.

This processing category includes the data of natural person representatives of the legal person customers, clients and/or suppliers.

Data of the Processor:

NAME: Parainesis Kereskedelmi és Szolgáltató Kft.

Győrújbarát, Kákostó u. 7.

REPRESENTED BY: Managing Director, Deputy Managing Director

WEBSITE: www.parainesis.hu

PURPOSE OF PROCESSING: Under the legal title of performing a contract, for the purposes of concluding, performing a contract, providing a contractual discount.

LEGAL BASIS FOR PROCESSING: - Performance of legal obligation - Contractual performance

SCOPE OF PROCESSED DATA: - Customer name, address, tax number - Client invoices

- Client purchase prices, turnovers- Vendor invoices
- Contact details of natural person representatives of customers: name, address, phone number, email address, online identifier of the natural person

PERSONAL DATA MAY BE VIEWED BY: - Employees performing customer service-related tasks

- Employees and data processors performing work-related tasks such as, in particular, employees, collaborators and data processors performing taxation, payroll preparation, social security (paying) activities of the Processor.

DURATION OF STORAGE OF PERSONAL DATA: 5 years from the termination of the contract

You can request information on the processing, furthermore, you can request the erasure, blocking of your personal data. You can make an objection against processing of your personal data, you can exert your rights laid out in other legislation as well as you can turn to a court in case your rights are violated.

Regarding the processing of your personal data, you can also turn to the Hungarian National Authority for Data Protection (NAIH; www.naih.hu).

Requests in relation to your rights can be sent to the following contact detail of the Controller, in writing:

➤ email: adatkezeles@parainesis.hu

3.2 Information note on the use of a CCTV surveillance system

PARAINESIS Kft. makes use of an electronic CCTV surveillance system in its plant areas allowing image recording and storage for the purposes of protecting human life, bodily integrity and personal liberty as well as protection of assets, raw materials and for quality assurance.

The system captures the behaviour of those entering the area!

The legal basis for the processing is the voluntary consent of those entering the area, which is done by his/her implicit conduct. If you enter the surveillance area knowing this information, your consent is deemed given to recording image.

If you do not give your consent to this, do not enter the area marked with the information board!

- The CCTV surveillance system operates 7 days a week, 24 hours a days, recording data directly.
- Providing data to a third party is done only in cases laid out in the legislation.
- No automated decision-making, profiling is performed in connection with the processing.

Data of the Processor:

NAME: Parainesis Kereskedelmi és Szolgáltató Kft.

Győrújbarát, Kákostó u. 7.

REPRESENTED BY: Managing Director, Deputy Managing Director

WEBSITE: www.parainesis.hu

PURPOSE OF PROCESSING: To protect human life, bodily integrity, personal liberty and assets protection.

LEGAL BASIS FOR PROCESSING: Consent of the data subject.

SCOPE OF PROCESSED DATA: Image, behaviour of the data subject

PERSONAL DATA MAY BE VIEWED BY: Managing Director, Deputy Managing Director

**DURATION OF STORAGE OF PERSONAL DATA: 3
days**

You can request information on the processing, furthermore, you can request the erasure, blocking of your personal data. You can make an objection against processing of your personal data, you can exert your rights laid out in other legislation as well as you can turn to a court in case your rights are violated.

Regarding the processing of your personal data, you can also turn to the Hungarian National Authority for Data Protection (NAIH; www.naih.hu).

Requests in relation to your rights can be sent to the following contact detail of the Controller, in writing:

- email: adatkezeles@parainesis.hu

3.3 Information note on processing of data related to job applications

PARAINESIS Kft. interprets the submission of applications as clear and explicit consent that allows it to process personal data contained in the applications as is defined in this Information note. The Employer uses the personal data located in the documents submitted for job applications only in its decision-making processes in connection with filling the specific position.

The Employer seeks to know personal data that are relevant in connection with the specific position.

In accordance with the Information note of the data protection authority dated 2016, the Employer may get to know public personal data relevant from the point of view of work posted on the social sites of the applicant, the Employer provides prior information on this circumstance to the applicant. The Employer shall not save, store, forward any personal data in connection with the social site of the applicant.

Data of the Processor:

NAME: Parainesis Kereskedelmi és Szolgáltató Kft.

REPRESENTED BY: Managing Director, Deputy Managing Director

WEBSITE: www.parainesis.hu

PURPOSE OF PROCESSING: filling the announced job title, concluding the employment contract

LEGAL BASIS FOR PROCESSING: Consent of the data subject.

SCOPE OF THE PROCESSED DATA: scope of data relevant for the job title

PERSONAL DATA MAY BE VIEWED BY: Managing Director, Deputy Managing Director, employees performing work-related tasks

DURATION OF STORAGE OF PERSONAL DATA:

The applicant can request information on the processing, furthermore, he/she can request the erasure, blocking of his/her personal data. He/she can make an objection against processing of his/her personal data, he/she can exert his/her rights laid out in other legislation as well as he/she can turn to a court in case his/her rights are violated. Regarding the processing of his/her personal data, he/she can also turn to the Hungarian National Authority for Data Protection (NAIH; www.naih.hu).

Requests in relation to his/her rights can be sent to the following contact detail of the Controller, in writing:

➤ email: adatkezeles@parainesis.hu

4. Procedure relate to the requests of the data subject

The Controller shall provide information on the request to exert his/her rights to the data subject private person about the fulfilling of the request, the possible refusal of the request and options to take judicial remedy without undue delay but within 30 days (one month) at the latest after the receipt of the request of the data subject. 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.

Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

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.

PARAINESIS Kft. as Controller shall provide information under Articles 13 and 14 and any communication (under Articles 15 to 22 and 34 of the Regulation) and any actions taken free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the Controller may, taking into account the administrative costs of providing the information or communication or taking the action requested:

- charge a fee of HUF 5 900 or
- refuse to act on the request.

The Controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

Where reasonable doubts concerning the identity of the natural person making the request arise, the Controller may request the provision of additional information necessary to confirm the identity of the data subject.

5. Contact details of the Authority

In Hungary, the authority overseeing data protection is:

Hungarian National Authority for Data Protection

(NAIH) <http://naih.hu>

Address: 1125 Budapest, Szilágyi Erzsébet fasor

22/C. Mailing address: 1530 Budapest, Pf.: 5.

Email: ugyfelszolgalat@naih.hu Phone: +36 (1)
391-1400

The data subject can submit a complaint to NAIH, if in his/her position the processing of his/her personal data do not meet the requirements laid down in legislation.

Against the decision of NAIH a judicial review can be initiated.