

## **General information on data protection and data processing**

This document provides detailed information on the protection of your personal data and guidance as to how we use and process such. BSS Communications Kft (the "**Company**") strictly complies with the applicable data protection provisions when using and processing personal data. We will only process personal data in accordance with the applicable data protection laws in force; the Company shall have the right to use personal and anonymous data to the extent permitted by applicable European Union and Hungarian law, while warranting your rights as described below.

This privacy and data processing notice (the "**Notice**") describes in detail your rights and available choices about data processing, and our obligations and actions regarding data protection and your obligations and rights in connection with data processing.

When you contact us, you acknowledge that we will process certain personal data as per the nature of the establishment of contact and in accordance with this Notice.

If you use our website, please note that this Notice applies only to [www.bsscommunications.com](http://www.bsscommunications.com) and its associated sub-pages, and does not apply to websites controlled and operated by third parties. In the case of websites controlled and operated by third parties, please check their separate privacy statements, as these websites are not under our control and our Company is thus not responsible for their content or their privacy policies.

### **I. Who is the data controller?**

The controller is BSS Communications Kft

Our contact details are as follows:

Title: Ákos György Berkes, Owner & CEO

e-mail address: [akos.berkes@bsscommunications.com](mailto:akos.berkes@bsscommunications.com)

### **II. What are the basic concepts of data protection and data processing?**

Personal data is any data or information which, alone or in combination with other data or information, renders it possible to identify, directly or indirectly, a specific person.

Your personal data includes principally your name, address, date and place of birth, your mother's name, your identity document number - these constitute the so-called personal identification data. However, any other data which, in combination with any of the above data renders your identification possible, is also considered personal data.

Some personal data are entitled to special protection, such as health data. The Company does not process sensitive personal data.

Any operation which is performed on personal data, such as the collection, storage, use or application, organisation, transmission, modification, combination with other data, erasure or destruction of data, is considered processing.

### **III. What are your rights in relation to data processing?**

The data subject is entitled at any time to:

- a.) request information about the processing of their personal data,
- b.) request the correction of their personal data,
- c.) request the restriction of the processing of their personal data (by the withdrawal of their consent to certain processing or by altering the channels specified for communication by the data subject),
- d.) request the deletion of your personal data (withdraw your consent to data processing altogether),
- e.) request the transfer of your personal data to another data controller (data portability).

The data subject may exercise the rights set out above by sending a statement to our contact person at the contact details specified in Section I of this document.

The data subject may request information from our Company about the processing of his or her personal data. Our Company will respond to requests in writing within 30 days. The information will be provided free of charge if the applicant has not yet submitted a request for information to our Company in regarding the same subject during the year when the application is filed. Otherwise, the information will be provided pending reimbursement of the costs incurred.

The data subject may request our Company the correction of the data processed, by reference to the correct data. Our Company will carry out the corrections in its records and notify the data subject of the correction.

The data subject may at any time, without restriction and without any obligation to pay a fee, withdraw in writing, in whole or in part, the consent already given to the processing of his or her data, without the obligation to provide any reason. Our Company shall, without undue delay after the notification of the withdrawal of consent, ensure the cessation of processing, permanently erase from its records the personal data affected by the withdrawal, notify the data processor and the persons involved in any data transfer of the deletion, and comply with its legal obligations to keep records of any data processed. Exceptions to this rule are personal data that our Company may process, as set out above, for the purposes of compliance with a legal obligation to which it is subject or for legitimate interests established by our Company's consideration of its own interests, without further specific consent and even after the withdrawal of the consent originally granted by the data subject.

The data subject may request, in writing or otherwise, that our Company transfer his or her data processed by our Company to a third party controller designated by the data subject (data portability). Our Company will transfer the data within 30 days of the request, delete the transferred data from its records and notify the data subject thereof.

### **IV. What options do you have in case of a complaint?**

The data subject may at any time lodge a complaint about the data processing by sending an email to our Company's email address, after which the complaint shall be investigated.

If the data subject does not agree with the result of the investigation, the action taken by our Company or otherwise believes that harm has been done to him or her by the processing of his or her personal data, he or she may contact the National Authority for Data Protection and Freedom of Information (postal address: 1363 Budapest, Pf. 9.; address: 1055 Budapest, Falk Miksa utca 9-11.; telephone: +36 (1) 391-1400; fax: +36 (1) 391-1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu); web: <http://naih.hu>) or to the competent court (that is, the competent court in your place of residence).

In all cases, we recommend that the data subject send his or her complaint or enquiry directly to us using one of the contact details above so that we can resolve the problem as soon as possible.

## **V. How do we protect personal data?**

We will take all necessary measures to ensure that your data is handled securely and without corruption by protecting the confidentiality, integrity and availability of your data. Confidentiality in this context means that only those persons authorised under this Notice to process your data shall have access to it. Integrity means that personal data must be accurate and adequate for the purposes for which it is processed. Accessibility means that authorised users are able access the data if they need to do so for the purposes for which they are authorised.

The electronic and manual recording, recording and storage of data will be in accordance with the applicable policies of our Company and those of the data processor(s). The applicable policies will include detailed requirements for access to the data.

We continuously monitor, maintain and update the systems and software we use to process your data.

IMPORTANT! Please note that you are responsible for the security and confidentiality of any user data and passwords transferred to you or communicated to you.

## **VI. What data do we collect and process?**

We process personal data only in accordance with the data protection provisions in force. Whenever you contact us, for example, to request an offer or service, correspond with us or fill in a form on our website, you acknowledge that we will process the data you provide in the course of the transaction you had initiated.

When you visit our website, so-called cookies will automatically collect personal data. For further information on this subject, please visit our website.

## **VII. How long do we process and store personal data?**

We process personal data only for the period of time necessary for the purposes for which they are processed or for as long as we are required to do so by law. Simultaneously with the purpose of the processing being fulfilled, or if the legal obligation is lifted, or if the data subject so requests, the relevant personal data will be deleted or anonymised. Our company reserves the right to cease processing, except for data necessary for the performance of the service, and to delete the data at an earlier date if the processing is no longer necessary.

## **VIII. To which third parties do we transfer personal data?**

We do not transfer your personal data to countries outside the European Union, nor do we transfer your personal data to third parties for their own business purposes (for example, data mining or direct marketing companies). However, we may need to transfer particular data to different authorities or other data controllers or data processors for various reasons.

#### *VIII.1. Transmission to public authorities*

Our company may be required by law or in response to a request from a public authority to disclose certain data to the competent authorities (such as the police). In the event of a data breach, i.e. where data we process is accidentally or unlawfully destroyed, lost, altered, disclosed to a third party without authorisation or accessed by a third party without authorisation, we may be required to disclose certain data to the data protection authority.

#### *VIII.2. Transfer to processors*

When processing personal data, our Company uses professional partners, so-called data processors, who act on behalf of our Company. The list of data processors used by our Company is provided in the table at the end of this Notice and the Data Processor will keep this list up to date and make it available on its website. This will enable you to check at any time to which processors your personal data may be transferred.

The data processor must carry out his/her activities in accordance with the mandate and the applicable legal requirements. Our Company is liable to the data subject for any damage caused by the data processor.

We have carefully selected our data processing partners, who take appropriate technical and organisational measures to ensure that your data is processed in accordance with data protection regulations and that your rights are protected. The partners must not use the personal data provided for their own business purposes and must not transfer the data to third parties.

### **IX. What is the legal basis and purposes of our data processing?**

Personal data will be processed only in accordance with the rules of Regulation (EU) 2016/679 of the European Parliament and of the Council 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) and Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information (Infotv.),

- i. in connection with the preparation and performance of the contract you intend to enter into with our Company,
- ii. where our legitimate interest so requires (for example, for the purposes of a contractual or non-contractual claim); or
- iii. where you have given your explicit consent to the processing of your data for one or more specific purposes and in one or more specific ways.

In addition to the above, our Company may be required by law to process certain data or to retain it for a certain period of time.

#### **IX.1.1. Processing based on explicit consent**

Our company controls your personal data (name, address, date and place of birth, telephone number, e-mail address) for automated decision-making and profiling and for commercial purposes, such as the promotion of new product offers, promotions, market research, sweepstakes and charity campaigns, only to the extent that you have consented to when you completed the consent form.

#### *IX.1.2. Automated decision-making and profiling*

Our Company may, with the explicit and prior consent of the data subject, send certain targeted enquiries by automated decision-making and profiling based on data about the data subject that is held by our Company or lawfully obtained from other sources. Automated decision-making is based on a predefined selection of criteria according to a profile that can be determined on the basis of historical data, such as, among others, data concerning the data subject's identity (e.g. gender, age, residence, occupation, preferences), his or her living conditions (e.g. marital status and situation, income), and usage patterns. The purpose of the profiling is to develop offers that are best suited to the habits and preferences regarding usage of the person concerned.

The data subject may at any time request further information about the way in which the profiling is carried out, in particular about the data taken into account, the conclusions drawn from them and the source of the data.

If you wish to participate in an event organised by our Company and you apply or register for the event, we will process the personal data you provide for the purposes of assessing the expected number of participants, organising admission and personal participation and contacting you in connection with these purposes.

In the absence of any other data processing purpose, the data processed for the above purposes will be deleted immediately after the event in question, but within 30 days at the latest.

#### **What are cookies and social plugins and what are they for?**

Our website automatically collects data through the use of cookies, which are small text files that store internet settings. Almost all websites use this technology.

When you visit the website for the first time, the cookie is automatically downloaded from your search engine. The next time you access the website from the same device, the cookie - and the information it contains - is either sent back to the website that created it (known as a 'private cookie') or to another website to which it belongs (known as a 'partner cookie'). This allows the website to recognise that the page has been accessed using this search engine and, in some cases, to modify the content displayed.

For more information about the cookies used on our websites, please see the links on each website.

#### **Who is entitled to learn about your data that we process?**

The processed data may be accessed by the competent employees of our Company and by the employees of the data processors designated in this Notice to the extent necessary for the performance of their duties.