

DATA PROCESSING REGULATION

Acting as a controller, our Company specifies the objectives and means of personal data processing individually or together with others, and processes personal data.

Data 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.

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.

As a controller, our Company respects the privacy of all the people who supply personal data to it, and is committed to protect them.

I.

Within the meaning of Article 13 of the GDPR, our Company hereby provides the following information to data subjects:

Controller's data:

Name: SZOMEL Szolgáltató és Kereskedelmi Kft.

Contact data: center@szomel.hu

Controller's representative: Executive Manager Csaba Szombathy

Data transfer:

No data transfer is executed outside the EEA.

In order to comply with accounting and taxation obligations, the controller forwards invoices to the processor providing accounting services.

The controller's electronic data are made available to the IT specialist in order to complete their assignments (data security, recovery, etc.).

Data protection officer:

Pursuant to Article 37 of the GDPR, our Company is not obligated to designate a data protection officer.

Data protection requests: should you have any requests or questions related to data processing, you can send your application by post to the following address: 1028 Budapest, Aszú utca 47. Our replies will be sent to the address specified by you without delay, but within 30 days at the latest.

II.

Purpose, legal grounds, and term of processing by our Company:

Purposes of data processing:

Our Company processes data for the following purposes, in line with legal regulations:

- a) in relation to the provision of our services, service users' data shall be processed in order to prepare and perform the relevant contract, as well as to comply with our legal obligations; .
- b) marketing activities for potential clients;
- c) processing of contractual partners' contact data in order to perform the relevant contract;
- d) fulfilment of client orders;
- f) performance of obligations specified by law.

Legal grounds for data processing:

GDPR Article 6 (1) (a): consent by the data subject

GDPR Article 6 (1) (b): necessary for the performance of a contract

GDPR Article 6 (1) (c): necessary for compliance with a legal obligation

GDPR Article 6 (1) (f): legitimate interest; balancing of interests is always required

Legal grounds for each data processing activity:

- a) issuance of invoices in compliance with accounting regulations – legal basis: GDPR Article 6 (1) (c)
- b) keeping contacts – legal basis: GDPR Article 6 (1) (b)
- c) processing of contractual partners' data – legal basis: GDPR Article 6 (1) (b)

Data subjects have the right to object, pursuant to which personal data will no longer be processed, unless data processing is justified by compelling reasons (e.g. performance of legal obligations).

Term of data processing:

Invoices shall be preserved for at least 8 years by legal obligation. The retention period of documents serving as a basis for issuing invoices is 8 years.

The retention period of data provided for communications is 1 year following the termination of the relationship.

Retention period of data related to contract performance: 5 years.

III.

Rights of data subjects:

Data subjects have rights related to their personal data as specified by law.

Rights of data subjects:

- a) right of access (inspection of data, the fact whether data processing is performed);
- b) rectification of any obsolete or incorrect data;
- c) erasure (in case of data processing based on consent or unlawful data processing;
- d) restriction of data processing;
- e) prohibition of the use of personal data for direct marketing purposes;
- f) transfer of personal data to a third party service provider or prohibition thereof;
- g) obtaining a copy of any personal data processed by the controller; or
- h) objection to the use of personal data.

IV.

Personal data breach:

A 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 processed.

Our Company ensures a level of data security appropriate to the risk associated with data processing in terms of physical, informational, organizational and administrative measures. Such procedures are specified in the Data Security Regulations of our Company.

In the case of a breach of data security, the controller or its representative shall without undue delay, but not later than 72 hours after having become aware of it, notify such breach to the supervisory authority and inform the data subject as well.

Having been made aware of a personal data breach, our Company shall take, without undue delay, any and all security measures as required for the elimination of or recovery from such damage serving as a basis of such personal data breach and for business continuity.

Data subjects shall be notified of the measures taken and the results thereof.

V.

Website:

Cookie means data sent by the visited website to the browser of the visitor (in the form of a variable name value), so that it should store it and later on the same website is able to load its content.

Types of cookies:

1. Technically essential session cookies include cookies without which the site simply could not operate functionally; they are required for user identification, e.g. to process whether they have logged in, what they have placed in the cart, etc. This typically means the storage of a session ID; the rest of the data will be stored on the server, which is more secure this way. They have a security aspect: if the values of session cookies are generated improperly, the risk of a session hijacking attack exists; therefore it is absolutely necessary to have these values properly generated. In other terminologies, session cookies mean any and all cookies which are deleted upon exiting from the browser (one session constitutes one browser use from launch to exit).
2. Cookies to facilitate use mean cookies which remember user choices, such as the site format preferred by the user. These types of cookies substantially mean the settings data stored in the cookies.
3. Performance cookies: although they do not really have anything to do with "performance", they usually mean cookies used for collecting data on how visitors behave on the website visited, the time spent and the clicks made there. They typically include third-party applications (e.g. Google Analytics, AdWords, or Yandex.ru cookies). These are suitable for visitor profiling.

It is not compulsory to accept or allow the use of cookies. You can restore your browser settings to reject all cookies or to indicate if a cookie is being sent by the system.

Cookies applied on the website

1. Technically essential session cookies

Purpose of data processing: To ensure proper website operation.

2. Cookies to facilitate use:

Purpose of data processing: To enhance service efficiency; to boost user experience; and to make website use more comfortable.

3. Performance cookies:

They collect information on how visitors behave on the website visited, the time spent and the clicks made there. They typically include third-party applications (e.g. Google Analytics, AdWords).

Purpose of data processing: To perform website analysis, and to send offers advertised.

VI.

Information on legal remedies:

Data protection supervisory authority in Hungary: Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: NAIH, address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C, e-mail address: ugyfelszolgalat@naih.hu). Data subjects can lodge a complaint to NAIH if, in their standpoint, the processing of their personal data fails to comply with regulatory obligations.

A judicial review of NAIH decisions is allowed to be initiated.

Dated in Budapest, 10.09.2024.



SZOMEL Szolgáltató és Kereskedelmi Kft.

data controller

represented by: **Csaba Szombathy**

Executive Manager

