

## **Grepton Informatikai Zrt.**

### **Privacy Policy and Data Protection Regulations**

Grepton Informatikai Zrt., as data controller, respects the privacy of all individuals who provide personal data to it. Pursuant to Article 13 of the European Union General Data Protection Regulation (Regulation No. 679/2016, hereinafter: GDPR), it provides the following information:

Grepton Informatikai Zrt. is committed to protecting the personal data of its users and business partners/clients, and considers the respect of its clients's right to informational self-determination to be of utmost importance, as well as respecting the personal rights of its partners and clients. Grepton Informatikai Zrt. handles the personal data it records confidentially, in accordance with data protection legislation and international recommendations, in compliance with this data management policy, and takes all security, technical and organisational measures that guarantee the security of the data.

The purpose of this Privacy Notice ("Notice") is to provide detailed information to partners entering into client relationships about all material facts relating to the handling of their data, in accordance with Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information ("Infotv.") and the General Data Protection Regulation 679/2016 of the European Union ("GDPR").

Information on matters arising in connection with the data management activities of Grepton Informatikai Zrt. (hereinafter: "Data Controller" or "Company") and the currently valid version of this Policy is continuously available at [www.grepton.hu](http://www.grepton.hu).

Name of Data Controller: Grepton Informatikai Zrt.

Company registration number: 01 10 044561

Tax number: 12613056-2-42

Representative of the Company: Zoltan Madar, Chief Executive Officer

#### **Contact details of the Data Controller:**

Address: 1087 Budapest, Konyves Kalman krt. 48-52., Hungary

E-mail: [mail@grepton.hu](mailto:mail@grepton.hu)

Phone: +36 1 2047730

## **1. SCOPE OF THE NOTICE - PERSONAL, MATERIAL AND TEMPORAL SCOPE**

The Notice applies to all persons whose personal data is processed by the Company for business purposes. By transmitting their personal data to the Company, the Data Subject accepts the provisions of this Notice and consents to the processing of their data in accordance with the Notice. The Company is entitled to unilaterally amend the Notice at any time.

### **1.1. PERSONAL SCOPE COVERS:**

- the Company, as Data Controller,
- persons whose data is contained in the data processing activities covered by this Notice, and
- persons whose rights or legitimate interests are affected by the data processing, or who provide personal data to the other party (hereinafter: "Data Subject")

### **1.2. MATERIAL SCOPE COVERS:**

The Notice covers all personal data processing conducted in all organizational units of the Company, regardless of whether it is carried out electronically and/or on paper.

### **1.3. TEMPORAL SCOPE:**

This Notice is effective from 25 May 2018 until further notice or withdrawal.

## 2. DEFINITIONS

For the purposes of this Notice, the following definitions apply:

"personal data": any information relating to an identified or identifiable natural person; 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;

"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 by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

"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;

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

"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;

"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;

"third party": a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

"consent": 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;

"special categories of data": personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

Other concepts defined by the GDPR are contained in Article 4 thereof.

### **3. PRINCIPLES OF DATA PROCESSING, LEGAL BASIS, DATA SECURITY, STORAGE OF PERSONAL DATA AND INFORMATION SECURITY**

#### **3.1. LEGAL BASES FOR THE COMPANY'S DATA PROCESSING:**

Personal data may only be processed in accordance with the purpose of the given processing.

The legal bases for the Company's data processing are:

- a.) the Data Subject has given consent to the processing of their personal data for one or more specific purposes;
- b.) processing is necessary for compliance with a legal obligation to which the Company is subject;
- c.) processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract;
- d.) processing is necessary in order to protect the vital interests of the Data Subject or of another natural person;
- e.) processing is necessary for the performance of a task carried out in the public interest;
- f.) processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data.

#### **3.2. PRINCIPLES OF ENSURING DATA SECURITY:**

The Company ensures that the data security rules prescribed by the applicable legislation are enforced. When determining and applying measures to ensure data security, the Company takes into account the current state of the technology and selects the solution that provides a higher level of protection for personal data, unless it would cause disproportionate difficulty.

#### **3.3. TRAINING OF EMPLOYEES**

The Company ensures the appropriate training of the employees concerned in order to enforce the conditions of data security.

#### **3.4. ENSURING PROTECTION LEVELS**

The Company provides the expected level of protection during the processing of data, especially their storage, correction and deletion, and during requests for information or objections from Data Subjects.

## **4. GENERAL PURPOSES AND LEGAL BASIS FOR DATA PROCESSING**

### **4.1. GENERAL PURPOSES OF DATA PROCESSING**

a.) Preparation, conclusion and performance of contracts concluded with or to be concluded with the Company, in particular:

- recording, storing and managing the Data Subject's data for the purpose of establishing and maintaining contact with the Data Subject or the Client who can be associated with the Data Subject;
- recording, storing and managing the Data Subject's data for the purpose of concluding a contract with the Data Subject or the Client and proving the concluded contract;
- managing the Data Subject's data in connection with ensuring the rights and fulfilling the obligations arising from the contractual relationship;
- forwarding the Data Subject's data to the Partner, if unavoidable;
- managing the contact data of Clients;
- property protection and personal security

b.) Fulfilling the legal obligations of the Data Subject and the Company, enforcing their legitimate interests;

c.) Exercising rights and fulfilling obligations arising from the contract after the termination of the contract;

d.) Prevention, investigation and disclosure of misuse;

e.) Direct business solicitation and market research by the Company, subject to a specific separate consent;

f.) Improving the quality of service appropriate to the Company's profile, conducting market research and assessing habits for this purpose.

### **4.2. LEGAL BASIS FOR DATA PROCESSING**

1. Personal data may be processed if the Data Subject consents thereto, or if processing is ordered by law or, on the basis of authorisation by law, by a subordinate legislation for a purpose based on public interest (mandatory processing).

2. As a general rule, the legal basis for data processing is the prior, voluntary consent of the Data Subject based on the Data Controller's prior information. In addition, the Company also processes data for the performance of a contract, for the fulfilment of a legal obligation applicable to it, and for the enforcement of the legitimate interests of the parties.

3. In the case of voluntary data provision by the Data Subject, the Company processes personal data with the consent of the Data Subject.

4. In cases where the Data Subject and the person providing personal data relating to the Data Subject are not the same person, the person providing the data is responsible for having the appropriate authorisation from the Data Subject.

5. The Company hereby informs the Data Subjects that the Data Subject is entitled to withdraw their consent at any time.

### **4.3. DURATION OF DATA PROCESSING**

1. The duration of data processing for each voluntary data processing activity has been determined in the description of the data processing. In general: until the purpose is achieved and the personal data is deleted, or until the Data Subject's consent is revoked, or until a court or authority's decision to delete is executed, or until the limitation period for rights and obligations arising from the legal relationship in connection with which the Company processes the personal data. The general limitation period under the Civil Code is 5 years.
2. In the case of mandatory data processing, the applicable law or regulation determines the duration of data processing.
3. In the case of complaint handling, mandatory data processing for the data concerned is 5 years pursuant to Section 17/A § 7. of Act CLV of 1997.

### **4.4. GENERAL RULES**

- For certain services, it is possible to provide additional data that help to fully understand the Data Subject's needs, but these are not conditions for using the services provided by the Company.
- The Company stores personal data provided during any data processing activity in separate data files, kept separate from other provided data.
- Persons with access to personal data at the Company are subject to an obligation of confidentiality.
- The transfer of data takes place with the Data Subject's consent, without prejudice to their interests, confidentially, with the provision of an appropriate information system that fully complies with this, in compliance with the purpose, legal basis and principles of data processing.

## **5. DESCRIPTION OF INDIVIDUAL DATA PROCESSING ACTIVITIES**

### **5.1. PROCESSING OF PERSONAL DATA OBTAINED IN THE COURSE OF BUSINESS ACTIVITIES AND PARTNER RELATIONS**

The Company may process personal data in the course of its business activities, insofar as such data is forwarded to it by the Data Subject. Scope of Data Subjects: persons establishing contact with the Company, natural persons establishing business relationships, and legal entities providing natural person data, as well as persons acting on behalf of such legal entities.

Purpose of data processing: contacting, providing offers, providing services, identifying clients, maintaining contact, fulfilling accounting obligations.

Scope and purpose of processed data:

Data	Purpose
name	identification
email address	maintaining contact
phone number	maintaining contact
personal data provided during performance	identification
billing/correspondence address	maintaining contact, accounting obligation
requested product/service/activity	service provision

Duration of data processing: the time necessary for the purpose of data processing, which in some cases coincides with the existence of the contractual relationship, but at most until the withdrawal of consent or until the deadline for enforcement of claims (5 years from performance of the contract) and the time determined by accounting legislation (8 years).

### **5.2. DATA PROCESSING ACTIVITIES CARRIED OUT BY THE COMPANY AS A PROCESSOR**

The Company undertakes to provide appropriate guarantees that the data processing activities it carries out as a data processor comply with the requirements regulated in the GDPR and implement appropriate technical and organisational measures to protect the rights of Data Subjects.

### **5.3. COMPLAINT HANDLING**

The Company provides the opportunity for Data Subjects to submit complaints regarding ordered products, completed repairs and/or the Company's conduct, activities or omissions verbally (in person, by phone) or in writing (e-mail, by post). Duration of data processing: The Company retains the minutes taken about the complaint and the copy of the response for five years pursuant to Section 17/A.§ (7) of Act CLV of 1997.

### **5.4. DEBT COLLECTION**

Debt collection includes all measures taken by the Company for the collection of its overdue claims.

### **5.5. MANAGEMENT OF DATA OF VISITORS WITH ONE-TIME ACCESS**

Purpose of data processing: Only private individuals or companies with authorisation are entitled to enter the Company's premises. Duration of data processing: Maximum 24 hours from departure.

## 5.6. CAMERA SYSTEM

Security cameras have been installed in the office building serving as the Company's registered seat by the building operator for the purpose of protecting human life, physical integrity and personal freedom, guarding dangerous materials, protecting business and payment secrets, testing developed systems, and preventing and investigating accidents.

## 5.7. DATA PROCESSING RELATED TO MARKETING

### 5.7.1. NEWSLETTER SENDING

The Data Subject may subscribe to the newsletter before or during the use of services, or in other ways, using the data specified below.

Legal basis for data processing: Subscription to the newsletter is based on voluntary consent.

Scope of Data Subjects: Every natural person, and the natural person acting on behalf of legal entities, who wishes to be regularly informed about the Company's news and therefore subscribes to the newsletter service by providing their personal data.

Scope and purpose of processed data:

Data	Purpose
name	identification
e-mail address	newsletter delivery

The purpose of data processing related to newsletter sending is to provide the recipient with comprehensive general or personalised information about the Data Controller's latest events, news and promotional products.

The Data Controller processes the personal data collected for this purpose only until the Data Subject unsubscribes from the newsletter list or does not give further confirmation. The Data Subject can unsubscribe from the newsletter at any time, at the bottom of electronic letters, or by sending a cancellation request to mail@grepton.hu. By post: Grepton Informatikai Zrt., 1087 Budapest, Konyves Kalman krt. 48-52.

The Data Controller reviews the newsletter list every two years and requests a renewed consent. The data of Data Subjects who do not give renewed consent are deleted from the database.

### Data Processor for Newsletter Distribution - Mailchimp

For its newsletter and e-mail marketing activities, the Company uses the Mailchimp service (operated by Intuit Inc.) as a data processor. Upon a Data Subject's newsletter subscription, the Data Subject's name and e-mail address are transferred to and stored in the Mailchimp system for the duration of the subscription.

<b>Name of Data Processor</b>	Intuit Inc. (Mailchimp)
<b>Registered seat</b>	675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA
<b>Purpose of data processing</b>	Sending marketing e-mail communications (newsletters, promotional offers) to
<b>Scope of data processed</b>	Name, e-mail address, subscription date, open and click statistics

<b>Basis for data transfer</b>	Data transfer to the USA is carried out on the basis of Standard Contractual Clauses
<b>Privacy policy of Data Processor</b>	<a href="https://www.intuit.com/privacy/statement/">https://www.intuit.com/privacy/statement/</a>

Mailchimp's data processing terms and privacy policy are available on the data processor's website. The data processor processes data exclusively in accordance with the Data Controller's instructions and within the scope of the data processing agreement.

Duration of data processing: until deletion upon the Data Subject's request, or if the Data Subject does not provide further consent.

#### **5.7.2. PRESENCE ON SOCIAL MEDIA AND MARKETING:**

The Company is accessible on the Facebook social portal, as well as other social media platforms (LinkedIn). The primary purpose of content posted on these platforms is to present the Company's activities, structure, job opportunities, and company-related news. Duration of data processing: until deletion upon the Data Subject's request.

#### **5.8. MANAGEMENT OF DATA OF DATA SUBJECTS APPLYING FOR POSITIONS**

Purpose of data processing: The Company operates a career page at [www.grepton.hu](http://www.grepton.hu) to provide information about its current job offers. Uploading a CV to the career page requires acceptance of the separate Recruitment-related Privacy Policy and Privacy Statement available on the [www.grepton.hu](http://www.grepton.hu) website.

## **6. DATA PROCESSORS**

For the purpose of achieving the data processing objectives, the Company uses the services of third parties for certain tasks, which services may include the processing of personal data of Data Subjects. These third parties ("Data Processors") carry out data processing in accordance with the Company's instructions and in compliance with the applicable legal requirements. Only personal data necessary for the realisation of the given purpose are forwarded to each Data Processor.

The Data Processors performing the processing of Data Subjects' data for the Company are listed in the Annex to this Policy.

## **7. DATA TRANSFER**

Data transfer takes place with the Data Subject's consent, without prejudice to their interests, confidentially, with the provision of an appropriate information system, in compliance with the purpose, legal basis and principles of data processing. The Company transfers data to data controllers/processors with whom it has a contractual relationship, whose list is contained in the Annex to this Policy.

In the case of data transfer - with the exception of data transfer based on legal provisions - the Company transfers the personal data only to recipients that are established in the European Union, or that provide adequate guarantees that their data processing complies with GDPR requirements.

## **8. RIGHTS OF DATA SUBJECTS AND LEGAL REMEDIES**

The Company draws the attention of Data Subjects that in the event of a complaint or observation, it is advisable first to use the option of contacting the Company as Data Controller via one of the following contacts: e-mail: mail@grepton.hu, or by post: Grepton Informatikai Zrt., 1087 Budapest, Konyves Kalman krt. 48-52.

### **List of rights of the Data Subject:**

a) Right to information and access

The Data Subject has the right to obtain confirmation from the Company as to whether or not personal data concerning them is being processed, and, where that is the case, access to the personal data.

b) Right to rectification and completion

The Data Subject has the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning them.

c) Right to erasure / right to be forgotten

The Data Subject has the right to obtain from the Company the erasure of personal data concerning them without undue delay where the purpose of processing has ceased.

d) Right to restriction of processing

The Data Subject has the right to obtain from the Company restriction of processing where one of certain conditions applies.

e.) Right to data portability

The Data Subject has the right to receive the personal data concerning them in a structured, commonly used and machine-readable format.

f) Right to object

The Data Subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on point (e) or (f) of Article 6(1) of the GDPR.

## **9. PROCEDURE WHEN A DATA SUBJECT SUBMITS A REQUEST**

The Data Subject may address their request or other question or request relating to their personal data to the Company at the addresses indicated in this Notice, via any of the contact details specified therein.

The Company is obliged to evaluate the request within 25 days of receipt of the written request. If the Data Subject disagrees with the Company's decision, or if the Company misses the relevant procedural deadline, the Data Subject may turn to the supervisory authority or court.

## **10. SUPERVISORY AUTHORITY**

Following contact with the Company, if the Data Subject considers that the processing of their personal data by the Company infringes the applicable data protection legislation, in particular the provisions of the GDPR, they are entitled to file a complaint with the National Authority for Data Protection and Freedom of Information.

### **Contact details of the National Authority for Data Protection and Freedom of Information:**

Website: <http://naih.hu/>

Address: 1125 Budapest, Szilagyi Erzsébet fasor 22/c., Hungary

Postal address: 1530 Budapest, P.O. Box 5.

Phone: +36-1-391-1400 Fax: +36-1-391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

## **11. RIGHT TO BRING LEGAL ACTION (RIGHT TO APPLY TO A COURT)**

The Data Subject - independently of the right to lodge a complaint - may bring proceedings before a court if their GDPR rights have been infringed in the course of processing their personal data.

The Company reserves the right to unilaterally amend this Privacy Policy at any time.

## **Annex 1: Data Processors of the Data Controller**

### **1. Name of Data Processor: Finacont Kft.**

**Address of Data Processor: 1062 Budapest, Aradi u 16., Hungary**

Tax number: 12788886-2-42

Representative: Managing Director

Purpose of data processing: Payroll processing, tax consulting

### **2. Name of Data Processor: Allianz Hungaria Biztosito Zrt. (Office Building Operator)**

**Address of Data Processor: 1087 Budapest, Konyves Kalman krt. 48-52., Hungary**

Tax number: 10337587-4-44

Representative: Member of Board of Directors

Purpose of data processing: Visual area monitoring, personal and property protection

### **3. Name of Data Processor: Dr. Lajtos Law Firm**

**Address of Data Processor: 1136 Budapest, Uszodaru u. 6., Hungary**

Representative: Dr. Laszlo Lajtos, attorney-at-law

Purpose of data processing: Legal services, attorney activities

### **4. Name of Data Processor: Intuit Inc. (Mailchimp)**

**Address of Data Processor: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA**

Purpose of data processing: Marketing e-mail communication (newsletter sending)

## Annex 2: Information on the Use of Cookies

(1) In line with general internet practice, our Company also uses cookies on its website. A cookie is a small file containing a string of characters that is placed on the visitor's computer when they visit a website.

(2) Our Company's website records and processes the following data about the visitor and the device used for browsing during the use of the website: the IP address used by the visitor, the type of browser, the characteristics of the operating system of the device used for browsing (set language), time of visit, the (sub)page, function or service visited.

(3) Acceptance and enabling of cookies is not mandatory. You can reset your browser settings to refuse all cookies, or to indicate when a cookie is being sent.

### **You can find information about the cookie settings of the most popular browsers at the following links:**

- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=en>

-

Firefox:

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

- Microsoft Edge: <http://windows.microsoft.com/en-us/windows-10/edge-privacy-faq>

- Safari: <https://support.apple.com/en-us/HT201265>

(4) The cookies used on the website are not in themselves suitable for identifying the user.

### **1. Technically necessary session cookies**

These cookies are necessary for visitors to browse the website and use all its features smoothly and comprehensively. Purpose of data processing: to ensure the proper functioning of the website.

### **2. Cookies requiring consent:**

2.2. Performance cookies:

Google Analytics cookies - more info:

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

Google AdWords cookies - more info: <https://support.google.com/adwords/answer/2407785>