

Privacy INFORMATION

28 March 2022

Stanctechnik Kötészeti Kft. (hereinafter referred to as „the Company”) publishes the following Privacy Notice to inform the data subjects.

Name of the Company:

Stanctechnik Kötészeti Kft.

Company seat: 1047 Budapest, Baross utca 11-15.

Production site: 1047 Budapest, Baross utca 11-15.

Company registration number: 01-09-936329

Tax number: 12233142-2-41

Data Protection Officer

The activities of Stanctechnik Kötészeti Kft. do not fall within the cases listed in Article 37(1) of the GDPR and therefore it does not appoint a Data Protection Officer.

Principles of data management

Personal data is:

processed by our Company lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

collected for specified, explicit and legitimate purposes and not further processed by our Company in a manner that is incompatible with those purposes ('purpose limitation');

adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

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');

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 ('storage limitation');

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').

Security of data processing

The protection of personal data during the operation of the Company is based on physical, logical and administrative

pillars. The IT tools used in the service are selected and operated in such a way that the data processed are accessible to those authorised to access them (availability); their authenticity and credibility are ensured (credibility of data management); their unaltered character can be verified (data integrity); and they are protected against unauthorised access (data confidentiality).

The Company maintains *confidentiality in the processing of the data*: it protects information from access by unauthorised persons;

integrity: protects the accurate and complete method of information and processing;

availability: ensures access to the required information by the authorized user when he or she actually needs them, and makes the necessary devices available for this purpose.

The IT system and network of our Company and its partners are both protected against computer assisted fraud, espionage, sabotage, vandalism, fire and flood, computer viruses, computer intrusions and attacks that could lead to denial of service. Stanctechnik Kötészeti Kft. ensures security through server-level and application-level protection procedures.

We inform our users that electronic messages transmitted over the Internet, regardless of the protocol (e-mail, web, ftp, etc.), are vulnerable to network threats that could lead to fraudulent activity, contract disputes or disclosure or modification of information. The service provider shall take all reasonable precautions to protect from such threats. It shall monitor systems in order to record and provide evidence of all IT incidents. System monitoring allows checking the effectiveness of the applied security measures as well.

Data processing by the Company

The data processing not detailed in the following list are the internal data management processes of Stanctechnik Kötészeti Kft., which are further discussed in the Company's policies and are disclosed to data subjects in all necessary cases, in accordance with the rules.

1. *Data processing in connection with the filling of vacancies*

The purpose of data management: to select suitable prospective employees to fill vacancies and to process the personal data of applicants.

The scope of managed data: name, telephone number, e-mail address, personal data provided by the applicant in the CV uploaded.

The legal basis for data management: Article 6(1)(a) GDPR, “the consent of the data subject”.

Deadline for data storage: until the data subject requests the deletion of the data, but not later than the date on which the job is filled.

Exceptions to this are personal data obtained from Profession.hu, which the Employer is obliged to delete once the position is filled, but no later than 90 days after the CV or other documents were downloaded.

2. *Data processing in connection with corporate events organised for marketing purposes*

The purpose of data management: to document company events, to maintain contact with the clientele, to strengthen trust, to expand the clientele.

The scope of managed data: photo, location, behaviour.

The legal basis for data management: Article 6(1)(a) GDPR, “the consent of the data subject”.

Deadline for data storage: until the data subject requests deletion of the data.

In all cases, the data subjects will be informed (in accordance with Articles 13 and 14 of the GDPR) in the invitation to the event and in this Privacy Information. In all cases, the data subjects will be informed of the consequences of not giving their personal consent to the processing and, if possible, of the conditions under which they may still participate in the event.

3. *Data processing in relation to the website*

The purpose of data management: to fill open positions, to initiate making appointments, to send a request for a quotation.

The scope of managed data: name, e-mail address, telephone number, postal address in the case of individuals.

The legal basis for data management: Article 6(1)(a) GDPR, “the consent of the data subject”.

Deadline for data storage: until withdrawal of the consent by the data subject.

For the purposes of customized service, the service provider puts a small data package, a so-called cookie on the user’s computer and reads it back at a later visit. When the browser sends back a previously saved cookie, the service provider managing such cookie has the opportunity to link the user’s current visit to the former ones, but only in respect of its own content.

4. *Processing of data relating to targeted information about partners for non-advertising purposes*

The purpose of data management: sending non-advertising, operational, production information.

The scope of managed data: name, e-mail address, postal address.

The legal basis for data management: Article 6(1)(a) GDPR, “the consent of the data subject”.

Deadline for data storage: until withdrawal of the consent by the data subject.

The Company shall not send targeted information for operational/production purposes without the data subject's consent, even if it informs the data subject that they may opt out. The recipient of the information is also entitled to opt-out of receiving the information and to refuse to receive the electronic advertisement by sending a message by post or by e-mail to koteszet@stanckoteszet.eu.

5. ***Processing of data relating to a one-off request for quotation***

The purpose of data management: to ensure contact, to maintain contact, to make offers.

The scope of managed data: name, e-mail address, message text (which may contain personal data).

The legal basis for data management: Article 6(1)(a) GDPR, "the consent of the data subject".

Deadline for data storage: until the date of submission of the offer.

6. ***Complaint management***

The purpose of data management: to ensure contact, to provide information on the investigation of the notification.

The scope of managed data: name, e-mail address, postal address, message text (which may contain personal data), telephone number.

The legal basis for data management: Article 6(1)(a) of the GDPR "the consent of the data subject" and Article 6(1)(c) of the GDPR "compliance with a legal obligation to which the controller is subject".

Deadline for data storage: the statutory retention period for the record of the notification and a copy of the reply letter is 5 years.

6. ***Data processing in the context of the creation, maintenance and termination of employment***

7. ***Data processing in relation to company events with the participation of employees***

8. ***Data processing to fulfil accounting obligations***

9. ***Data processing for meeting tax and contribution payment obligations***

10. ***Data processing in relation to training courses covered by the Adult Education Act***

11. ***Occupational health and safety assessment of fitness for work***

12. ***Data processing in relation to the control of work equipment***

Data Processors

The Company shall only use data processors that provide adequate guarantees to implement appropriate technical and organisational measures to ensure compliance of the processing with the requirements of this Regulation and to protect the rights of the data subjects. The Company shall stipulate in the data processing contracts that the processor shall process personal data solely on the basis of written instructions from the data controller;

it ensures that persons who are authorised to process personal data are bound by an obligation of confidentiality or are under an appropriate obligation of confidentiality based on law;

assists the data controller, to the extent possible and taking into account the nature of the data processing, by appropriate technical and organisational measures, in fulfilling its obligation to respond to requests relating to the exercise of the rights of the data subject;

deletes or returns to the data controller all personal data and deletes any existing copies after the provision of the data processing service, at the data controller's discretion, unless EU or Member State law requires the storage of personal data;

the data processor shall provide the data controller with all information necessary to demonstrate compliance with the obligations laid down in this article and to enable and facilitate audits, including on-site inspections, carried out by the data controller or by another auditor mandated by the data controller.

Data subjects' rights in relation to data processing

Data subjects may request information about the processing of their personal data and may request the rectification or, except for data processing required by law, the erasure of their personal data without undue delay, as indicated when the data were collected.

At the request of the person concerned, the data handler will provide information regarding the data handled by it or the data processed by the data processor it has commissioned, the purpose of data handling, its legal basis, duration, the name, address (seat) of the data processor, the activities connected to data handling or regarding who have received the data and for what purpose. The data controller shall provide the information in writing in an intelligible form within the shortest possible time from the date of the request, but not later than within 15 days. Such information shall be provided free of charge provided that the person requesting the information has not yet submitted a request for information to the data controller in the current year in the same field. In other cases, the Company shall charge a fee.

The data controller shall delete personal data if the processing is unlawful, the data subject requests it, the purpose of the data processing has ceased, or the statutory time limit for storing the data has expired, or it has been ordered by the court or the Hungarian National Authority for Data Protection and Freedom of Information.

The Company shall notify the data subject of the rectification and deletion, as well as all those to whom the data were previously disclosed for processing purposes. Notification may be omitted if this does not violate the legitimate interest of the data subject with respect to the purpose of the data management. **Data subjects may object to the processing of their personal data if**

the processing (transfer) of personal data is necessary solely for the purposes of the exercise of a right or legitimate interest pursued by the data controller or the recipient, unless the processing is required by law;

the purpose of the use or the transfer of personal data is direct marketing, public opinion survey, or scientific research; the exercise of the right to object is otherwise permitted by law.

The Company shall examine the objection within the shortest possible time from the date of submission of the request, but not later than 15 days, with the simultaneous suspension of the processing, and shall inform the applicant in writing of the outcome of the examination. If the objection is justified, the data controller shall terminate the processing, including further collection and further transmission, and block the data and notify the objection and the action taken on the basis of the objection to all those to whom the personal data concerned by the objection have been previously disclosed and who are obliged to take measures to enforce the right to object.

If the data subject does not agree with the decision of the data controller, they may challenge it in court within 30 days of its notification.

The Company may not delete the data of the data subject if the processing is required by law. However, the data may not be transferred to the data recipient if the data controller has consented to the objection or if the court has ruled that the objection is justified.

Legal remedies and complaints can be lodged with the Hungarian National Authority for Data Protection and Freedom of Information:

Registered office: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf.: 9.

Phone: +36 (1)391-1400

URL: <https://naih.hu>

E-mail: ugyfelszolgalat@naih.hu

Possibility to amend the privacy policy

The Data Controller reserves the right to unilaterally modify this Privacy Policy with prior notice to users. By using the service after the change has taken effect, you accept the modified privacy policy.

The most important legislation, standards and recommendations on information security and personal data management

the Fundamental Law of Hungary, Section 6 (3) of Act CXII on the Right of Informational Self-Determination and on Freedom of Information

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

Act XXXIV of 2019 on the amendments necessary for the implementation of the European Union reform on data protection Act V of 2013 on the Civil Code (Part Three - Rights relating to personality,

Titles XI; XII) Act I of 2012 on the Labour Code Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising

Act CVIII of 2001 on Electronic Commerce and on Information Society Services, Act LXXVII of 2013 on Adult Education

MSZ ISO/IEC 27001:2014 Security techniques. Information Security Management Systems. Requirements

MSZ EN ISO 19011:2012 Guidance on auditing management systems

MSZ EN 60950 Security requirements for data processing equipment and office machines.

Recommendation 12 of the Information Technology Interdepartmental Committee of the Office of the Prime Minister (MeH ITB) on physical, logical and administrative protection requirements for information systems and the security measures to be taken against them

ITSEC = Information Technology Security Evaluation Criteria is the European Community recommendation on functional and certification requirements for the security of information systems

TCSEC = Trusted Computer System Evaluation Criteria, an IT security recommendation issued by the US Department of Defense

Risk management methodology based on MeH ITB Recommendation 8

TCSEC = Trusted Computer System Evaluation Criteria, an IT security recommendation issued by the US Department of Defense

ISO/OSI 7498-2 refers to the security architecture of open systems. Hungarian equivalent: MSZ OSI 7498-1

Made in Budapest on 28 March 2022

Katalin Joóné Vass Managing Director