

Privacy Policy (v.1.0, 2018.05.25)

Regarding translations into languages other than Hungarian, please note that they are for information purposes only and that the Hungarian version of the information shall prevail in all cases.

A QFD Group Ltd. (registered office: 2330 Dunaharaszti, Sisak street 3., tax number: 13094892-2-13), (hereinafter referred to as the "**Data Controller**") is bound by the following information.

1. Concepts and interpretations

The following terms are used in our privacy policy:

- 1.1 **data subject/user**: any natural person who is identified or can be identified, directly or indirectly, based on personal data.
- 1.2 **personal data**: data which can be associated with the data subject, in particular the name, the identification mark and one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity, and the conclusions which can be drawn from the data concerning the data subject.
- 1.3 **data controller/provider**: the natural or legal person or unincorporated body which, alone or jointly with others, determines the purposes for which the data are to be processed, takes and implements the decisions concerning the processing (including the means used) or implements them through a processor on its behalf.
- 1.4 **data processing**: any operation or set of operations which is performed upon data, regardless of the procedure used, in particular any collection, recording, recording, organisation, storage, alteration, use, retrieval, disclosure, transmission, alignment or combination, blocking, erasure or destruction of data or any prevention of their further use, photographs, sound recordings or images and any physical features which permit identification of a person (e.g. fingerprints, palm prints, DNA samples, iris scans).
- 1.5 **data processing**: the performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data.
- 1.6 **data processor**: a natural or legal person or unincorporated body, under a contract with a controller including a contract concluded pursuant to a legal provision, processes personal data.
- 1.7 **data breach**: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- 1.8 **erasure**: making data unrecognisable so that it is no longer possible to recover it.
- 1.9 **restriction of processing**: marking of stored personal data for the purpose of restricting their future processing.

- 1.10 **filing system:** a set of personal data structured in any way, whether centralised, decentralised or structured according to functional or geographical criteria, which is accessible on the basis of specific criteria.
- 1.11 **profiling:** any form of automated processing of personal data in which personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- 1.12 **data subject's consent:** a voluntary, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies his or her agreement to the processing of personal data concerning him or her by means of a statement or an unambiguous act of affirmation;
- 1.13 **Biometric data:** any personal data relating to the physical, physiological or behavioural characteristics of a natural person obtained by means of specific technical procedures which allow or confirm the unique identification of a natural person, such as facial image or dactyloscopic data;
- 1.14 **health data:** personal data relating to the physical or mental health of a natural person, data relating to the provision of health services to a natural person which contain information about the health of the natural person;
- 1.15 **enterprise:** any natural or legal person carrying on an economic activity, regardless of its legal form, including partnerships or associations carrying on a regular economic activity;
- 1.16 **cookie:** a file placed on the user's hard drive via the user's browser, which uniquely identifies the user on the next visit;
- 1.17 **third party:** a natural or legal person, public , agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- 1.18 **disclosure:** making the data available to anyone.
- 1.19 **IP address:** in all networks in which communication takes place according to the TCP/IP protocolserver machines have an IP address, i.e. an identification number that allows them to be identified over the network. It is well known that every computer connected to the network has an IP address through which it can be identified.
- 1.20 **special categories of personal data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membershipgenetic data and biometric data revealing the identity of natural persons, health data and personal data concerning the sex life or sexual orientation of natural persons.
- 1.21 **objection:** a statement by the data subject objecting to the processing of his or her personal data, requesting the cessation of processing and the erasure of his or her data.

2. Introduction

- 2.1. Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information
Article 20 (1) states that the data subject must be informed before the processing starts whether the processing is based on consent or whether it is mandatory.
- 2.2. Before any processing operation involving personal data is started, the data subject is informed clearly and in detail of all the facts relating to the processing of his or her data, in particular the purposes and legal basis of the processing, the identity of the controller and the processor, and the duration of the processing.
- 2.3. Please also note that, pursuant to Article 6(1) of the Info Act, personal data may be processed even if obtaining the data subject's consent would be impossible or would involve disproportionate costs, and the processing of personal data would.
- necessary for compliance with a legal obligation to which the controller is subject; or
 - is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, and the pursuit of those interests is proportionate to the restriction of the right to the protection of personal data. The information should also cover the rights and remedies of the data subject in relation to the processing.
- 2.4. Where it would be impossible or disproportionate to provide personal information to data subjects (for example, in the case of visitors to our Company's website), the information may be provided by disclosing the following information:
- a) the fact of data collection,
 - b) the range of stakeholders,
 - c) the purpose of the data collection,
 - d) the duration of the processing,
 - e) who is entitled to access the data,
 - f) the rights and remedies data subjects with regard to data processing; and
 - g) if the processing has been registered, the registration number of the processing.
- 2.5 Present data management information on at website data processing also website:
<https://www.qfdgroup.com/>
- 2.6 This Statement is available on our Company's website at www.qfdgroup.com
- 2.7 This privacy statement is effective from 25.05.2018 and is valid until revoked. Any subsequent amendments to this Privacy Statement shall be effective immediately upon publication on the Company's website and shall remain in force until revoked.

3. Processing of data relating to data subjects

3.1 We collect the following personal data through the website indicated in section 2.5 for the purposes of commercial, marketing and contacting, contacting:

- For newsletter subscribers: name, e-mail address, newsletter type(s);
- In case of contact: name, e-mail address, telephone number.

In the case of contact, the legal basis for data processing is the provision of information and complaint handling related to the request. The legal basis for processing is Article 6(1)(a) of the GDPR, the data subject's consent.

We process the personal data of persons who subscribe to our newsletter until they unsubscribe from our service. When subscribing, the data subject indicates his/her explicit intention to use the service by clicking on the "I subscribe" button. After the subscription, a message will be sent to our Company's website indicating the success of the subscription:

Congratulations!
You have successfully subscribed to [email provided].

If a user no longer wishes to receive newsletters from the newsletter

You can unsubscribe at any time by clicking on the "unsubscribe" link. Unsubscribing also implies the deletion of all data stored by the user in connection with the sending of the newsletter. data processing can also be terminated by sending an unsubscribe e-mail to info@qfdgroup.com or gdpr@qfdgroup.com.

3.2. It records certain visitor data for operational, system security and abuse prevention purposes.

Scope of data processed:

- the date and time of the visit,
- the address of the page visited and the page previously viewed,
- operating system and browser type,
- IP address.

The legal basis for processing is Article 6(1)f) of the GDPR, i.e. the legitimate interest of our Company and Article 13/A(3) of Act CVIII of 2001 on certain aspects of electronic commerce services and information society services.

3.3. The Data Controller announces various periodic prize draws on its website and in its newsletter, the participation in which is subject to registration. Unless otherwise provided for in the specific processing rules applicable to a particular competition or you exercise your right to erasure under the GDPR, the personal data you provide to us in the context of your registration for the competition will be used solely for the purposes of the competition (participation, notification, sending of the prize). The legal basis for the processing of data in the context of the prize draw is basically Article 6(1)b) GDPR, i.e. the contract concluded between the controller and the participant by registration. You have the possibility to withdraw your consent to the processing of your data in the context of the competition with future effect. The detailed rules for such cases are set out in the specific data processing rules for the relevant prize draw.

In the case of registration for a prize draw, the personal data processed are: name, e-mail address, home address, telephone number.

Storage period / criteria for determining the storage period:

Once the competition has ended and the winners have been notified, the personal data of the participants will be deleted. The data controller of the winners' data is the data controller pursuant to Article 169 of Act C of 2000 on Accounting.

(2) for a period of 8 years from the date of delivery of the Prize.

3.4. Please note that the HTML code of the pages available on our website indicated in section 2.5 may contain links from and to external servers independent of our Company. The providers of these links are able to collect information about users due to the direct connection to their servers.

3.5. Our newsletter service is provided by an external service provider (Mailchimp), which is committed to protecting your privacy.

3.6. Our Company uses Google Analytics to measure the traffic to its website indicated in section 2.5 and to monitor the behaviour of its visitors and to compile statistics. This program places so-called cookies on the user's computer (a program that collects data in the background and does not interfere with the operation of the computer), which collect user data. Visitors to our website also consent to the use of this program. According to Google, these cookies only record information that is not personally identifiable.

If you want to manage your cookie settings or disable the feature, you can do so from your own user's computer in your browser. This option can be found under cookies/cookies/tracking feature settings depending on the browser toolbar, but in general you can which tracking features you want to enable/disable on your computer under Tools > Settings > Privacy settings.

Users who do not want Google Analytics to report on their visit can install a browser extension to block Google Analytics. This add-on instructs the Google Analytics JavaScript scripts (ga.js, analytics.js, and dc.js) to stop sending visit information to Google. In addition, visitors who have installed the disabling browser extension will not be included in the content experiments.

To disable Analytics web activity, visit the Google Analytics opt-out page and install the extension on your browser. For more information on installing and uninstalling the extension, please refer to the help for your browser.

3.7. We also inform you that the personal data we process will be used only for the purposes indicated and will not be disclosed to third parties (except where legally authorised). The data may be viewed and processed only by our Company's employees, subject to our internal data protection rules. Your personal data will be processed for a maximum of 1 year from the date of collection and then deleted. Exceptions to this are data that are required by law to be processed for a longer period and data for which this statement indicates a different processing period.

3.8. If you wish to amend or delete your personal data or enquire about your personal data processed, you can use the contact form on the website.

or by writing to our company. We will respond to requests within 25 days of receipt.

4. Rules for data processing

- 3.1. Personal data must be processed lawfully and fairly, in a transparent and traceable manner for the data subject.
- 3.2. Personal data may only be collected for predefined, explicit and legitimate purposes.
- 3.3. The personal data must be kept to the extent necessary for the purposes for which they are processed, i.e. our Company collects and processes only as much and only such personal data as is strictly necessary for the purposes for which it is collected and processed (data minimisation principle).
- 3.4. The data controller shall keep personal data accurate and up to date and shall make every effort to correct or delete inaccurate data that comes to its attention (Accurate Processing Principle).
- 3.5. The data controller will process the data only for the predefined period. After that period, the data will be deleted.
- 3.6. The Data Controller processes personal data only on the basis of the prior written authorisation of the owner (after weighing the interests), for legitimate interests or on the basis of a legal authorisation.
- 3.7. Our Company is not obliged to obtain the prior consent of the data subject for the processing of his or her personal data when processing data on the basis of a legitimate interest following a balancing of interests or on the basis of a legal obligation. However, the scope and duration of such processing will be purpose- and time-limited, while the rights of the data subject under other laws will not be affected.

5. Data security, data protection

- 4.1 The controller shall design and implement the processing operations in such a way as to ensure the necessary and adequate protection of the personal data of the data subjects.
- 4.2 The data controller shall ensure the security of the data (password and antivirus protection), shall take the technical and organisational measures and shall establish the procedural rules necessary to enforce the Info Act and other data protection and confidentiality rules.
- 4.3 The data controller shall protect the data by appropriate measures and technical solutions, in particular against: unauthorised access,
 - b) the change,
 - c) the transmission,
 - d) the disclosure of,
 - e) deletion or destruction,
 - f) accidental destruction and damage,
 - g) against inaccessibility due to changes in the technology used.
- 4.4 Where necessary, the controller shall ensure, by appropriate technical means, that personal data stored in the records cannot be directly linked and attributed to the data subject.
- 4.5 The data controller shall take measures to prevent unauthorised access to, alteration of and unauthorised disclosure or use of personal data:
 - the development and operation of an appropriate IT and technical environment,

- the controlled selection, supervision and training of its staff,
 - issuing operational, risk management and service procedures, where appropriate.
- 4.6 The data controller shall also ensure the protection of the personal data processed by taking the following specific data protection measures at its own discretion:
- password protects all computers;
 - antivirus works on all computers;
 - access to personal data is limited to staff members who have an indispensable need for the purposes for which the data are processed;
 - staff receive regular data protection and information security training;
 - an internal computer usage policy that sets the framework for the IT operations of the company's employees.
- 4.7 The data controller's IT solution provider (Microsoft) and the small business IT solution suite it provides is SAE 16 SOC1 Type II and ISO27001 certified and continuously demonstrates its commitment to data protection.
- 4.8 The operator of our website ensures the data security of the server by the following measures: closed server room, daily data backup.

6. *Rights of data subjects*

- 5.1 The data subject may request the controller to provide him or her with information about the personal data processed and the processing thereof. He or she request the rectification of his or her personal data and the erasure or blocking of his or her personal data, except in cases of processing which is necessary for the performance of a compulsory or binding contract with the data subject or (after a balancing of interests) in the legitimate interest of the data subject.
- 5.2 You may exercise the rights described in the previous paragraph by writing to our Company. Our Company's mailing address is **2330 Dunaharaszti, Sisak utca 3.**, e-mail address: gdp@qfdgroup.com
- 5.3 At the request of the data subject, the controller shall provide information about the data of the data subject processed by the controller or by a processor appointed by the controller or on its behalf, the source of the data, the purpose, legal basis and duration of the processing, the name and address (if any) of the processor and the activities of the processor in relation to the processing, the circumstances and effects of the personal data breach (if any) and the measures taken to remedy the personal data breach, and, in the case of the transfer of personal data of the data subject, the legal basis and the recipient of the transfer.
- 5.4 The data controller, with the assistance of the manager or his or her delegated employee, shall keep a record of the personal data concerned, the number and type data subjects affected by the personal data breach, the date, circumstances, effects and measures taken to remedy the personal data breach, and other data specified in the legislation requiring the processing, for the purpose of monitoring the measures taken in relation to the personal data breach and informing the data subject.
- 5.5 The data controller (if there is a transfer) keeps a transfer register for the purpose of monitoring the lawfulness of the transfer and informing the data subject, which contains the date of the transfer of personal data processed by the data controller, the legal basis and the recipient of the transfer, the scope of the personal data transferred and other data specified in the legislation providing for the processing.
- 5.6 At the request of the data subject, the controller shall, after appropriate identification, provide information on the data processed by it or in relation to it, their source, the purpose, legal basis and duration of the processing, the name and address of any data processor and its activities in relation to the processing, and, in the case of the transfer of personal data of the data subject, the legal basis and the recipient of the transfer. The service provider shall provide the information in writing and in an intelligible form within the shortest possible time from the date of the request, but no later than 25 days from the date of receipt. The information shall be provided free of charge.

- 5.7 If the personal data is not accurate and the accurate personal data is available to the controller, the controller shall correct the personal data.
- 5.8 Instead of deletion, the data controller shall block the personal data if the data subject so requests or if, on the basis of the information available to it, it is likely that deletion would harm the legitimate interests of the User. Blocked personal data may be processed only for as long as the processing purpose which precluded the deletion of the personal data persists.
- 5.9 The Controller shall erase personal data if the processing is unlawful, the data subject requests it, the processed data is incomplete or inaccurate - and this situation cannot be lawfully remedied - provided that erasure is not precluded by law, the purpose of the processing has ceased to exist, or the statutory period for storing the data has expired, or the court or the National Authority for Data Protection and Freedom of Information has ordered it.
- 5.10 The controller shall mark the personal data that it processes if the data subject contests the accuracy or correctness of the personal data, but the inaccuracy or incorrectness of the contested personal data cannot be clearly established.
- 5.11 Rectification, blocking, flagging and erasure must be notified to the data subject and to all those to whom the data were previously disclosed for processing. Notification may be omitted if this does not undermine the legitimate interests of the data subject having regard to the purposes of the processing.
- 5.12 If the controller does not comply with the data subject's request for rectification, blocking or erasure for any reason, it shall, within 25 days of receipt of the request, communicate in writing the factual and legal grounds for refusing the request for rectification, blocking or erasure. In the event of refusal of a request for rectification, erasure or blocking, the controller shall inform the data subject of the possibility of judicial remedy and of recourse to the Authority.

7. Objections, legal remedies

6.1 You may object to the processing of your personal data if.

- a) the processing or transfer of personal data is necessary for the fulfilment of a legal obligation to which the controller is subject or for the purposes of the legitimate interests pursued by the controller, the recipient or a third party, unless the processing is required by law or (after a balancing of interests) is carried out for legitimate interests;
- b) the personal data are used or disclosed for direct marketing, public opinion polling or scientific research purposes;
- c) in other cases provided for by law.

6.2 The Data Controller shall examine the objection within the shortest possible time from the date of the request, but not later than 15 days, decide whether the objection is justified and inform the applicant in writing of its decision. If the controller establishes that the data subject's objection is justified, the 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 covered by the objection have been previously disclosed and who are obliged to take measures to enforce the right to object.

6.3 If the data subject does not agree with the decision taken by the controller, he or she may challenge it in court within 30 days of its notification.

6.4 Complaints against possible infringements by the data controller can be lodged with the National Authority for Data Protection and Freedom of Information:

*National Authority for Data Protection and Freedom of Information 1125 Budapest, Szilágyi Erzsébet fasor 22/C.
Postal address: 1530 Budapest, P.O. Box 5.
Phone: +36 -1-391-1400*

Fax: +36-1-391-1410

E-mail ugyfelszolgalat@naih.hu

8. Judicial enforcement

The controller must demonstrate that the processing is lawful. The data recipient must prove the lawfulness of the transfer.

The court has jurisdiction to hear the case. The action may also be brought, at the option of the person concerned, before the court of the place of residence or domicile of the person concerned.

A person who does not otherwise have legal capacity to sue can also be a party to the lawsuit. The Authority may intervene in the proceedings in order to ensure that the person concerned is successful.

If the court upholds application, the data controller shall be obliged to provide the information, rectify, block or erase the data, annul the decision taken by automated processing, take into account the right of the data subject to object, or disclose the data requested by the data subject.

If the court rejects the data subject's request, the controller is obliged to delete the data subject's personal data within 3 days of the judgment. The controller shall also be obliged to delete the data if the data subject does not apply to the court within the time limit.

The court may order the publication of its judgment, with the publication of the controller's identification data, if the interests of data protection and the protected rights of a large number of data subjects so require.

9. Compensation

If the controller infringes the data subject's right to privacy by unlawfully processing his or her data or by breaching data security requirements, the data subject may claim damages from the controller.

The controller is liable to the data subject for any damage caused by the processor and the controller is also liable to pay the data subject the damages due in the event of a personal data breach caused by the processor. The controller shall be exempted from liability for the damage caused and from the obligation to pay the damage fee if it proves that the damage or the infringement of the data subject's personality rights was caused by an unavoidable cause outside the scope of the processing.

No compensation or damages shall be payable if the damage or injury to the person concerned was caused by the intentional or grossly negligent conduct of the victim or by an infringement of the right to privacy.

10. Legislation taken into account

For this statement and in connection with our Company's data processing policy, we have taken into account the applicable laws, in particular the following:

- REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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, and repealing Regulation (EC) No 95/46/EC (General Data Protection Regulation)
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv.);
- Act V of 2013 (Civil Code);
- Act CLV of 1997 (Consumer Protection Act);
- Act C of 2000 (Act on Accounting);
- Act CVIII of 2001 (on certain issues of electronic commerce services and information society services (Eker. tv.));
- Act C of 2003 (Electronic Communications Act; Eht);
- Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising (Act XLVIII of 2008).