

T-10-0510
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M-10-0048)

**NOTICE ON DATA PROCESSING
of natural persons as contractual partners**

V: 05

NOTICE ON DATA PROCESSING

Notice on data processing of natural persons as contractual partners

Name		Job title / Position	Name of Employer / Approving Company
Process Owner:	Dr. Balázs Krisztina	internal regulatory compliance manager and	Bonafarm Zrt
Approved by:	Dr. Balázs Krisztina	internal regulatory compliance manager and	Bonafarm Zrt.

Date of entry into force: 01/05/2026

1. PURPOSE OF THE EMPLOYER'S NOTICE OF INFORMATION

The purpose of this regulatory document is to inform the Data Controllers about the processing of data related to the preparation or conclusion of contracts (e.g. real estate, land, crop sale and lease, leasehold contracts, integration, milk purchase, primary producer, business, transport, assignment, etc.) to be concluded with the data subject, as well as the performance of the concluded contracts, invoicing, and possible receivables management, managed by Bonafarm Zrt. and its subsidiaries as Employers/Data Controllers. This information also covers the processing of personal data collected directly from the data subjects or obtained from other sources (e.g. contracting parties) by the Data Controllers.

2. READING PRIVILEGES and SCOPE OF APPLICATION

2.1. Determination of reading privileges/scope of persons entitled to access to this document based on Annex M-10-0295 DocPortal Assignment of Rights:

All employees of Bonafarm Zrt. and its subsidiaries, as Employer companies belonging to the Bonafarm Group, as well as Data Controllers.

2.2. Determination of the scope of application based on Annexes M-10-0294 Areas of application, M-10-0296 Target areas:

The Approving Company, as the employer, accepts this regulatory document as its own declaration and employer's notice of information by approving it in the DocPortal document management system, and communicates it to the Employees by publishing the same in the DocPortal system in a manner customary and generally known locally.

This employer's notice of information applies to the following employees of the Employer:

This Data Protection Notice applies to all employees of the Employers/Data Controllers, named as representatives, contact persons or for any other reasons in individual contracts, as data subjects, as well as to employees identified in the Data Protection Notice as recipients of the Data Disclosure or as Data Processors.

3. RELATED DOCUMENTS

S-10-0010 Data Protection Policy

NOTICE ON DATA PROCESSING
of natural persons as contractual partners

CHAPTERS:

1. INTRODUCTION
2. DEFINITIONS
3. THE PURPOSE, LEGAL BASIS AND DURATION OF DATA PROCESSING, THE SCOPE OF PERSONAL DATA PROCESSED
4. PERSONS ENTITLED TO ACQUAINT THEMSELVES WITH THE DATA, RECIPIENTS OF THE DATA
5. SECURITY OF PROCESSING
6. EXERCISE AND ENFORCEMENT OF RIGHTS AND LEGAL REMEDY

1. INTRODUCTION

This Notice on data processing is intended to provide information on the data processing of natural persons or private entrepreneurs as contracting parties concerned e.g. seller, buyer, tenant, leaseholder, milk supplier, farmer, integration partner etc. (hereinafter **data subjects**), whose data are processed by the business organisations of Bonafarm Group as data controllers (hereinafter **Data controllers**), who become aware of the data through the preparation or conclusion of contracts (e.g. sales or lease contracts of property, land, produce; leasehold contract; integration, milk, farmer, management, delivery, business management contracts etc.) as well as through the execution of concluded contracts, invoicing or possible claims management. This Notice on data processing covers the processing of personal data communicated by the data subjects directly as well as those learnt by the Data controllers from other sources (e.g. contracting party).

2. DEFINITIONS

The terms used in this Notice shall have the following meaning:

Regulation: 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, and repealing Directive 95/46/EC (General Data Protection Regulation);

Bonafarm Group: the whole of business organisations belonging to Bonafarm Zrt. or its ownership interest, owned directly or indirectly by Bonafarm Zrt., and it is not considered a corporate group recognised by Section 3:49 of Law No 5/2013 on the Civil Code. It is not organised as a separate legal entity and does not have legal capacity; it cannot exercise any rights under its own name and cannot undertake any obligations.

data subject: a natural person or a private entrepreneur identified or identifiable based on any personal data; an identifiable natural person or private entrepreneur is one who can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to that natural person (Article 4(1) of the Regulation);

personal data: any information relating to the data subject – in particular identifiers such as a name, an identification number, location data, online identifiers provided by their devices, applications, tools and protocols, such as internet protocol addresses, cookie identifiers or other identifiers such as radio frequency identification tags (RFID) (Recital (30) of the Regulation), or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person or private entrepreneur – as well as any conclusions drawn from such information and data pertaining to the data subject (Article 4(1) of the Regulation).

data controller: the natural person, legal entity, public authority, agency or other body who/which alone or jointly with others, determines the purposes and means of the processing of personal data where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law; (Article 4(7) of the Regulation);

data 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 (Article 4(2) of the Regulation);

data processor: the natural or legal person, public authority, agency or other body who/which processes personal data on behalf of the controller (Article 4(8) of the Regulation);

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 (Article 4(10) of the Regulation);

data transfer: providing access to the data for a designated third party;

erasure of data: making the data unrecognisable in a way that their recovery is no longer possible;

objection: statement by the data subject in which they object to the processing of their personal data and request the termination of data processing and the erasure of the data processed;

representative of the controller/processor: a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under the Regulation (Article 4(17) of the Regulation);

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. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing (Article 4(9) of the Regulation);

3. THE PURPOSE, LEGAL BASIS AND DURATION OF DATA PROCESSING, THE SCOPE OF PERSONAL DATA PROCESSED

3.1. The purpose of data processing

Processing the data of natural persons or private entrepreneurs as contracting parties learnt by the Data controllers in the course of their economic activities prior to the conclusion of contracts with potential contracting parties or in relation to the execution of contracts concluded or the settlement of accounts:

- a) prior to the conclusion of contracts (e.g. quotations) for the purpose of concluding contracts with potential contracting parties,
- b) in order to record data of the contracting party for the purpose of concluding contracts,
- c) in relation to contracts concluded for the purpose of executing contracts,
- d) for the purpose of communication with the contracting parties,
- e) for the purpose of ensuring the settlement of accounts, demonstration of compliance, invoicing and invoice management for the contracting parties following the execution of contracts,
- f) for the purpose of claims management and debt collection with regard to contractual claims.

3.2. The legal basis of data processing

The fulfilment of legal obligations with regard to the data controller pursuant to point (c) of Article 6 (1) of the Regulation, with reference to invoicing obligation outlined in Section 159 (1) and Section 169 of the Law No 127/2007 on value added tax (hereinafter **Law on VAT**) as well as information reporting obligations towards the tax authority provided for under the tax legislation.

Point (b) of Article 6 (1) of the Regulation, having regard to the fact that **the processing of personal data is required for the execution of the contract to be concluded or already concluded with the contracting party concerned.**

3.3. The scope of personal data processed

- a) name of the data subject as a natural person or a private entrepreneur,
- b) personal identity data of the data subject (name at birth, place and date of birth, mother's name, address, personal identification number etc.),
- c) address of the registered office,
- d) tax number,
- e) tax identification number,
- f) number of authorisation/licence to carry out activities,
- g) data related to the establishment of contacts (e-mail address, phone number, address etc.),
- h) number and tax identification number of the family farming in the case of farmers where the principal activity is not carried out by the contracting party,
- i) bank account number,
- j) other identification numbers,
- k) personal data learnt by the Data controllers in relation to the business relationship or the execution of contracts.

Among the above data the ones related to the establishment of contacts are processed for the purpose of communication, and any further data are processed in order to achieve the objectives outlined in 3.1. by the Data controllers.

3.4. Duration of data processing

The Data controllers process the personal data of the data subjects for 8 years after the termination of the contract pursuant to Section 169 of Act C of 2000 on Accounting.

4. DATA CONTROLLER, RECIPIENTS OF THE DATA, DATA PROCESSORS

4.1. Data controllers

Data controllers are the below listed business organisations where the personal data of the data subject concerned is processed in relation to the preparation, conclusion or execution of existing contracts.

- a) **Bonafarm Zrt.** (mailing address: 1123 Budapest, Alkotás utca 53., MOM PARK, B torony, IV. emelet; e-mail address: info@bonafarm.hu; website: www.bonafarmcsoport.hu; phone number: +36-1-801-9061; represented by: Péter Ábrahám; contact: info@bonafarm.hu);
- b) **Bonafarm-Bábolna Kft.** (mailing address: 2942 Nagyigmánd, Burgert Róbert Agrár-Ipari park 03/25 hrsz.; e-mail address: info@btakipar.hu; website: www.babolnatakarmany.hu; phone number: +36-34-557-062; represented by: Gergely Balassa; contact: info@btakipar.hu);

- c) **Bóly Zrt.** (mailing address: 7754 Bóly, Ady E u 21.; e-mail address: birosag.iratok@boly.bonafarm.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/boly-zrt/; phone number: +36-69-57-0001; represented by: János Ádám; contact: birosag.iratok@boly.bonafarm.hu);
- d) **Csányi Pincészet ZRt.** (mailing address: 7773 Villány, Ady fasor 2.; e-mail address: villany@csanyipince.hu; website: www.csanyipinceszeti.hu; phone number: +36-72-492-141; represented by: László Romsics; contact: villany@csanyipince.hu);
- e) **Dalmand Zrt.** (mailing address: H-7211 Dalmand, Felszabadulás u. 42.; e-mail address: titkarsag@dalmand.bonafarm.hu; website: <http://www.bonafarmcsoport.hu/bonafarm-csoport/dalmand-zrt/>; phone number: +36-74-539-100; represented by: János Ádám; contact: titkarsag@dalmand.bonafarm.hu);
- f) **Fiorács Kft.** (mailing address: H-2941 Ács, Fő u. 43.; e-mail address: info@fioracs.bonafarm.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/fioracs-kft/; phone number: +36-34-385-677; represented by: Gábor Bakó; contact: info@fioracs.bonafarm.hu);
- g) **BonOffice Zrt.** (mailing address: 6725 Szeged, Horgosi út 31.; e-mail address: info@bonoffice.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/bonoffice; phone number: +36-62-567-231; represented by: Attila Fülöp; contact: info@bonoffice.hu);
- h) **PICK SZEGED Zrt.** (mailing address: H-6725 Szeged, Szabadkai út 18.; e-mail address: birosag.iratok@boly.bonafarm.hu; website: www.pick.hu; phone number: +36-62-567-000; represented by: Péter Szautner; contact: birosag.iratok@boly.bonafarm.hu);
- i) **SOLE-MiZo Zrt.** (mailing address: 6728 Szeged, Budapesti út 6.; e-mail address: solemizo@solemizo.bonafarm.hu; website: www.mizo.hu; phone number: +36-62-569-000; represented by: Péter Szautner; contact: solemizo@solemizo.bonafarm.hu);
- j) **Agroprodukt Zrt.** (mailing address: 8500 Pápa, Szent István út 12.; e-mail address: titkarsag@agroprodukt.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/agroprodukt-zrt/; phone number: +36-89-511-200; represented by: István Mádl; contact: titkarsag@agroprodukt.hu);
- k) **MCS Vágóhid Zrt.** (mailing address: 7700 Mohács, Pick Márk út 1.; e-mail address: mvagohid@gmail.com; website: www.mcs.hu; phone number: +36-69-887-651; represented by: Tamás Lengli; contact: mvagohid@gmail.com);
- l) **Véméendi Agrár Kft.** (mailing address: 7726 Véménd, Alkotmány u. 2.; e-mail address: birosag.iratok@boly.bonafarm.hu; website: <http://www.bonafarmcsoport.hu/bonafarm-csoport/boly-zrt/leanyvallalatok/>; phone number: +36-69-570-000; represented by: Szabolcs Tóth; contact: birosag.iratok@boly.bonafarm.hu);
- m) **Sertésenyésztő és Hízaló Bt.** (mailing address: 8531 Ihász, 0272 hrsz.; e-mail address: titkarsag@agroprodukt.hu; website: <http://www.bonafarmcsoport.hu/bonafarm-csoport/agroprodukt-zrt/>; phone number: +36-89-511-200; represented by: András Bíró; contact: titkarsag@agroprodukt.hu);
- n) **Galina Investment Kft.** (mailing address: 7951 Gerde, külterület hrsz. 070/5., e-mail address: szalaiz@montazs.co.hu; represented by: Edit Assenbrenner);
- o) **HUNGERIT Baromfifeldolgozó és Élelmiszeripari Zártkörűen Működő Részvénytársaság** (mailing address: 6600 Szentes, Attila út 2.; e-mail address: info@bonafarm.hu; website: www.valdor.hu; phone number: +36-1-801-9061; represented by: Tamás Lengli; contact: info@bonafarm.hu);
- p) **VALD-AVIS Ingatlanhasznosító Korlátolt Felelősségű Társaság** (mailing address: 6600 Szentes, Attila út 2., e-mail address: info@bonafarm.hu; website: www.bonafarm.hu; phone number: +36-1-801-9061; represented by: Tibor Nagy; contact: info@bonafarm.hu);
- q) **"BARCOMP" Baromfinevelő, Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság** (mailing address: 6600 Szentes, Attila út 2., e-mail address: info@bonafarm.hu; website: www.bonafarm.hu; phone number: +36-1-801-9061; represented by: Tamás Sarusi-Kis; contact: Tamas.Sarusi-Kis@bonafarm.hu);
- r) **BAR-INT Baromfitenyésztési és Integráció Szervezési Korlátolt Felelősségű Társaság** (mailing address: 6600 Szentes, Attila út 2., e-mail address: info@bonafarm.hu; website: www.bonafarm.hu; phone number: +36-1-801-9061; represented by: Tamás Sarusi-Kis; contact: Tamas.Sarusi-Kis@bonafarm.hu);
- s) **Felgyő-2000 Baromfinevelő és Hízaló Egyszemélyes Korlátolt Felelősségű Társaság** (mailing address: 6600 Szentes, Attila út 2., e-mail address: info@bonafarm.hu; website: www.bonafarm.hu; phone number: +36-1-801-9061; represented by: Tamás Sarusi-Kis; contact: Tamas.Sarusi-Kis@bonafarm.hu);
- t) **FELGYŐ-KEV Baromfitenyésztő, Takarmánygyártó és Forgalmazó Korlátolt Felelősségű Társaság** (mailing address: 6760 Kistelek, Hrsz. 0309/23., e-mail address: info@bonafarm.hu; website: www.bonafarm.hu);

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www.bonafarm.hu, phone number: +36-1-801-9061, represented by: Tamás Sarusi-Kis, contact: Tamas.Sarusi-Kis@bonafarm.hu);

- u) **PRIMA ENTEN Élelmiszeripari és Kereskedelmi Korlátolt Felelősségű Társaság** (mailing address: 4287 Vámospércs, Nyirábrányi út 6., e-mail address: info@bonafarm.hu, website: www.bonafarm.hu, phone number: +36-1-801-9061, represented by: Barnabás Bárczy and Norbert József Mészáros, contact: info@bonafarm.hu);
- v) **BONITÁS IT Korlátolt Felelősségű Társaság** (mailing address: 6725 Szeged, Szabadkai út 18., e-mail address: info@bonafarm.hu; website: www.bonafarmcsoport.hu; telefonszám: +36-1-801-9061, represented by: Péter Ábrahám, contact: info@bonafarm.hu);
- w) **Bonitás 2002 Zrt.** (mailing address: 1123 Budapest, Alkotás utca 53., MOM PARK, B torony, IV. emelet; e-mail address: gabor.kvancz@bonitas2002.hu; website: www.bonafarmcsoport.hu; telefonszám: +36-1-801-9061; represented by: Gábor Kvancz; contact: gabor.kvancz@bonitas2002.hu);
- x) **Bólyi-Sziebert Öntözési Korlátolt Felelősségű Társaság** (mailing address: 7754 Bóly, Ady Endre utca 21., e-mail address: info@bonafarm.hu, website: www.bonafarm.hu, phone number: +36-1-801-9061, represented by: László Héhl, contact: birosag.iratok@boly.bonafarm.hu);
- y) **Kislippói Öntözési Korlátolt Felelősségű Társaság** (mailing address: 7754 Bóly, Ady Endre utca 21., e-mail address: info@bonafarm.hu, website: www.bonafarm.hu, phone number: +36-1-801-9061, represented by: László Héhl, contact: birosag.iratok@boly.bonafarm.hu);
- z) **Ormány Öntözési Korlátolt Felelősségű Társaság** (mailing address: 7754 Bóly, Ady Endre utca 21.; e-mail address: info@bonafarm.hu, website: www.bonafarm.hu, phone number: +36-1-801-9061, represented by: László Héhl, contact: birosag.iratok@boly.bonafarm.hu);
- aa) **Fűztői Öntözési Korlátolt Felelősségű Társaság** (mailing address: 8500 Pápa, Szent István út 12., e-mail address: info@bonafarm.hu, website: www.bonafarm.hu, phone number: +36-1-801-9061, represented by: Péter Knoll, contact: info@agroprodukt.bonafarm.hu);
- bb) **Bakonyi Határ Mezőgazdasági Korlátolt Felelősségű Társaság** (mailing address: 8500 Pápa, Szent István út 12., e-mail address: info@bonafarm.hu, website: www.bonafarm.hu, phone number: +36-1-801-9061, represented by: Péter Knoll, contact: info@agroprodukt.bonafarm.hu);
- cc) **Nagykondai Öntözési Korlátolt Felelősségű Társaság** (mailing address: 7211 Dalmand, Fő utca 42., e-mail address: info@bonafarm.hu, website: www.bonafarm.hu, phone number: +36-1-801-9061, represented by: Szilárd Szentpáli, contact: titkarsag@dalmand.bonafarm.hu).

4.2. Recipients of the data

4.2.1. Data processors

- a) **Bonafarm Zrt.** (mailing address: 1123 Budapest, Alkotás utca 53. B torony 4. emelet; e-mail address: info@bonafarm.hu; website: www.bonafarmcsoport.hu), as business organisation providing master data management, IT, procurement and controlling services for the other Data controllers listed in the table above;
- b) **BonOffice Zrt.** (mailing address: 6725 Szeged, Horgosi út 31.; e-mail address: info@bonoffice.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/bonoffice), as business organisation providing accounting, limit and outstanding payment management, current account management and taxation services for the other Data controllers listed in the table above in relation to the execution of contracts concluded with the data subject;
- c) **Ernst&Young Kft.** (mailing address: 1132 Budapest, Váci út 20., e-mail address: v-nsz@v-nsz.hu; website: www.ey.com), as business organisation providing audit service for the Data controllers to the extent required for carrying out audit tasks;
- d) **BON-SEC Vagyonvédelmi Kft.** (mailing address: 1145 Budapest, Thököly út 105-107., e-mail address: info@bonsec.hu, website: www.bonsec.hu), as business organisation providing property protection and weighing services for the Data controllers;
- e) **Bóly Zrt.** (mailing address: 7754 Bóly, Ady E u 21., e-mail address: birosag.iratok@boly.bonafarm.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/boly-zrt),
 ea) as business organisation providing the following services for Dalmand Zrt. and Bonafarm-Bábolna Takarmány Kft. as data controllers:
 - comprehensive administration in relation to the procurement of goods and services,
 - administration in relation to the sales of food crop and feed industry stock,

- carrying out controlling tasks.
- eb) as business organisation providing the following services for FIORÁCS Kft. as data controller:
 - comprehensive administration in relation to the procurement of goods (produce, products) and services,
 - carrying out controlling tasks.
- ec) as business organisation providing the following services for Agroprodukt Kft. as data controller:
 - comprehensive administration in relation to the procurement of goods (produce, products) and services.
- f) **FIORÁCS Kft.** (mailing address: 2941 Ács, Fő u. 43., e-mail address: info@fioracs.bonafarm.hu; website: www.bonafarmcsoport.hu/bonafarm-csoport/fioracs-kft),
 - fa) as business organisation providing administrative services related to pork integration and commercial activity for Bóly Zrt. and Dalmand Zrt. as data controller;
 - fb) as business organisation providing administrative services related to pork sector consultancy, pork integration and commercial activity for Agroprodukt Zrt.,
- g) **Bonafarm-Bábolna Takarmány Kft.** (mailing address: 2942 Nagyigmánd, Burgert Róbert Agrár-Ipari park 03/25 hrsz., e-mail address: info@btakipar.hu; website: www.babolnatakarmany.hu), as business organisation providing the service of transport and loading of produce and products with Pálháza Feed Mill for Agroprodukt Zrt.;
- h) **Business Audit Kft.** (mailing address: 1125 Budapest, Tusnádi utca 6.B., e-mail address: szabocs@gmail.hu), as business organisation and sub-contractor of Bonafarm Zrt. providing business audit service for the Data controller;
- i) **ReachMedia Kft.** (mailing address: 1036 Budapest, Lajos utca 118-120.; e-mail address: nagy.attila@reachmedia.hu, website: www.reachmedia.hu), as business organisation responsible for the database management of the personal data to be found in the database processed by the Data controllers.

4.2.2. Other recipients

On the part of Data Controllers, the senior executives of the Data Controller companies, and the persons involved in the preparation, conclusion or performance of the contract on the part of the Data Controllers or the Data Processors, in the case of accounting documents, it is the employees of BonOffice Zrt. providing tax and accounting services, and in the case of further data processors, it is the persons involved in providing the service associated with data processing.

5. SECURITY OF PROCESSING

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons or private entrepreneurs, the Controller and the Processor(s) shall implement appropriate technical and organisational measures that ensure to data subjects a level of data security appropriate to the risk.

In assessing the appropriate level of security, account shall be taken by the Controller in particular of the risks that are presented by processing, in particular arising from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transferred, stored or otherwise processed.

The Controller and Processor(s) shall take steps to ensure that any natural person acting under the authority of the Controller and Processor(s) who has access to personal data does not process them except on instructions from the controller, unless they are required to do so by Union or Member State law.

Accordingly the Controller and the Processor(s) shall ensure:

- a) physical security, including the physical protection of all elements of the IT infrastructure that are involved in serving the given service, the guarding of the facilities housing the systems, as well as the supervision and control of access to the premises;

- b) logical security, which comprises the allocation of logical access to the given IT service based on the principle of least privilege, the supervision and control thereof, ensuring the confidentiality and integrity of the stored data;
- c) the availability of systems, including ensuring the uninterrupted operation and continuity of service provision as specified in the SLA (Service Level Agreement);
- d) to perform risk analyses, where potential internal and external risks that may arise in relation to data processing and data management are identified, such as the risk of unauthorised access;
- e) the uninterrupted execution of backups, that ensure the maximum rate of data loss as specified in the agreement;
- f) patch-management, which ensures the up-to-date status of the server of the service used (OS, Application backend, Database), thus minimising the risk of threats arising from the exploitation of vulnerabilities;
- g) performing vulnerability tests, which test at least every two years whether the tasks recorded in patch-management have been duly and properly implemented, whether there are known vulnerabilities whose patching has not been implemented or only implemented in part;
- h) escalation, that in the event of errors ensures the solution available in the shortest possible time.

6. EXERCISE AND ENFORCEMENT OF RIGHTS AND LEGAL REMEDY

Data subjects may exercise their below rights under the Regulation in respect of the above detailed nature of the various legal grounds.

6.1. Rights of the data subject

6.1.1. Transparent information

The Controller shall provide all information required in the Regulation in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for information addressed specifically to children. Information is provided by the Controller in writing or by other means, e.g. electronically, but upon request by the data subject the information may also be provided orally, provided that the identity of the data subject is proven by other means.

6.1.2. Right of access to own personal data

At the request of the data subject, the Controller provides information as to whether or not personal data concerning them are being processed. Where it is established that personal data are indeed processed, the data subject may request access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with the Supervisory Authority;
- g) where personal data are not collected by the Controller directly from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
- i) where the data subject's personal data are transferred to a third country or to an international organisation by the Controller, the data subject shall have the right to be provided information relating to the transfer.

6.1.3. Rectification of inaccurate personal data

If the Controller processes inaccurate or incomplete personal data on the data subject, it shall rectify such data without undue delay after receipt of the data subject's request to this effect. The data subject also has the right to have incomplete personal data completed.

6.1.4. Right to erasure ('right to be forgotten')

The data subject has the right to request from the Controller the erasure of personal data concerning them without undue delay and request the Controller to comply with such request without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- c) the lawfulness of processing is the legitimate interest of the Controller, to which the data subject objects and there are no overriding legitimate grounds for the processing;
- d) the purpose of data processing is direct marketing, to which the data subject objects;
- e) the personal data have been unlawfully processed by the Controller;
- f) the personal data of the data subject have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
- g) the lawfulness of the processing of personal data by the Controller is based on consent granted by the guardian of a child, and/or
 - ga) The person in question is the child's guardian, and the child in question is under the age of 16 as required to grant consent;
 - gb) the person in question is the child who is over the age of 16 as required to grant consent.

The Controller may not erase personal data if processing is required on the following grounds:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing or for the performance of a task carried out in the public interest or in the exercise of official authority;
- c) for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional;
- d) for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;
- e) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the data subject's right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- f) for the establishment, exercise or defence of legal claims.

6.1.5. Right to restriction of processing

Upon the data subject's request, the Controller restricts processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject objects to processing on the grounds that the Controller has named its legitimate interest as legal basis, but the data subject states that their interests override those of the Controller.

Where processing has been restricted upon request by the data subject, such personal data may, with the exception of storage, only be processed

- a) with the data subject's consent, or
- b) for the establishment, exercise or defence of legal claims, or
- c) for the protection of the rights of another natural person or private entrepreneur or legal person, or
- d) for reasons of important public interest of the Union or of a Member State.

The Controller shall inform the data subject before lifting the restriction of processing.

6.1.6. Right to data portability

The data subject shall have the right to receive the personal data concerning them, which they have provided to the Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where:

- a) the processing is based on consent or a contract; and
- b) the processing is carried out by automated means.

The data subject shall also have the right to have the personal data transmitted directly from one controller to another.

6.1.7. Right to object

The data subject has the right to object to processing, where

- a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- b) processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, including profiling;
- c) where the data subject objects to processing for direct marketing purposes, including profiling, provided it is linked to direct marketing.

In the case of processing based on legitimate interest as per the above subsection b), the data subject may not object to processing if the Controller demonstrates that

- a) there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or
- b) for the establishment, exercise or defence of legal claims.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes by the Controller.

6.1.8. Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

The data subject may not exercise the above right if the decision:

- a) is necessary for entering into, or performance of, a contract between the data subject and the Controller;
- b) is authorised by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests;
- c) is based on the data subject's explicit consent.

In the above detailed subsection a) and c), the data subject may request human intervention, may express their point of view and lodge a complaint against the decision.

6.1.9. Withdrawal of consent

The data subject is only entitled to withdraw consent at any time in matters where processing is based on their consent. The withdrawal of consent shall not affect the lawfulness of any processing that was conducted based on the consent prior to its withdrawal. Prior to granting consent, the data subject shall be informed thereof by the Controller.

The declaration by the data subject withdrawing consent is only valid if the given processing is clearly identified.

6.2. Enforcement of rights, lodging complaints, legal remedy

6.2.1. Enforcement of rights

The above specified data processing rights may be exercised by the data subject via email sent to the Controller's email address or to the Controller's registered office email address from the data subject's identifiable email address, or by post in a letter signed by the data subject. The declaration by the data subject on the exercise of rights is only valid if the given processing is clearly identified. The Controller responds to requests submitted electronically in electronic form or in the manner specified by the data subject.

6.2.2. Lodging complaints

If the data subject considers that the processing of personal data relating to them infringes the provisions of the Regulation, the data subject have the right to lodge a complaint with the Supervisory Authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement.

Within the territory of Hungary, complaints may be lodged with the National Authority For Data Protection and Freedom of Information (hereinafter the **NAIH**), as Supervisory Authority. Contact details of the NAIH:

Email: ugyfelszolgalat@naih.hu
Mailing address: H-1055 Budapest, Falk Miksa u. 9-11.
Telephone: +36 (1) 391-1400
Website: www.naih.hu

The names and contact details of data protection authorities in the territory of the European Union are available at http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

6.2.3. Legal remedy

a) Judicial remedy against the Supervisory Authority

All data subjects have the right to an effective judicial remedy:

- aa) against a legally binding decision of a supervisory authority concerning them, or
ab) where the Supervisory Authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

Proceedings against the Supervisory Authority shall be brought before the courts of the Member State where the Supervisory Authority is established.

b) Judicial remedy against the Controller or Processor

The data subject is entitled to file for action with the courts against the Controller or Processor where they consider that their rights under this Regulation have been infringed as a result of the processing of their personal data by the Controller or the Processor acting on its behalf or under its instructions in non-compliance with the mandatory legal act of the European Union.

Proceedings against the Controller or Processor shall be brought before the courts of the Member State where they are established. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has their habitual residence, unless the Controller or Processor is a public authority of a Member State acting in the exercise of its public powers.

Alternatively, such proceedings may also be brought before the courts in Hungary, before the court competent according to the data subject's habitual residence or place of stay.