

## DATA PROTECTION POLICY

Informing you as a visitor of our website and as a customer of our services about the data processing and data protection rules of our Company.

### 1. What are the principles we follow in our data processing?

Our Company follows the principles below during its data processing:

- a) Personal data is processed lawfully, fairly and in a transparent manner in relation to the data subject;
- b) Personal data is collected only for specified, explicit and legitimate purposes and is not treated in incompatible ways.
- c) The personal data we collect are appropriate and relevant in relation to the purposes of the processing, and only limited to what is necessary.
- d) Our Company takes all reasonable measures to ensure that the data handled by us are accurate and, where necessary, kept up to date. Inaccurate personal data are corrected or deleted immediately.
- e) The personal data is stored in a form that you can be identified only as long as necessary to achieve the goals of the processing of personal data.
- f) Appropriate technical and organizational measures ensure adequate security of personal data against unauthorized or unlawful processing of data, accidental loss, destruction or damage.

### Regarding your personal data, our Company:

- a) Processes, i.e. collects, records, organizes, stores and uses your personal data based on your prior and voluntary informed consent and only to the necessary extent.
- b) In some situations, the processing of your personal data is based on regulatory requirements and mandatory. In such cases, we draw your attention to this fact separately.
- c) In some situations, e.g. the operation, development and security of our website, the processing of your personal data is in the legitimate interest of our Company or of third parties.

### 2. Who are we?

- The seat of our Company: 1095 Budapest, Ipar utca 5.
- Our Company's website: [www.kereskedohaz.hu](http://www.kereskedohaz.hu)
- Contact: [info@tradehouse.hu](mailto:info@tradehouse.hu)
- Postal address: 1095 Budapest, Ipar utca 5.
- Tax number: 24220099-2-43
- Company registration number: 01-10-047651
- Phone number: +36 1 810-1600
- E-mail address: [info@tradehouse.hu](mailto:info@tradehouse.hu)

- The name of our Company's data protection officer: dr. Varga-Szilágyi Szandra
- Contact information of our Company's data protection officer: [vago.szandra@tradehouse.hu](mailto:vago.szandra@tradehouse.hu)

Our company engages the following data processors in order to ensure high quality services for our customers:

NAME	ADDRESS	ACTIVITY
<b>Trinity International Communications Korlátolt Felelősségű Társaság</b>	1037 Budapest, Kiscelli u. 104.	<i>measuring web traffic to our website, preparing reports</i>

**Data processors engaged for our newsletter service:**

NAME	ADDRESS	T ACTIVITY
<b>Trinity International Communications Korlátolt Felelősségű Társaság</b>	1037 Budapest, Kiscelli u. 104.	<i>database maintenance and processing, preparing reports</i>

In case of any modification regarding our data processors, the present data protection policy document will be updated.

**The data processed by us:**

Description of the activity and the purpose of the data processing	Legal basis	Processed data	Duration
<p><b>Visiting the website</b></p> <p>The purpose consists in ensuring the proper and high-quality operation of the website, in controlling and improving the quality of our services, in identifying malicious visitors attacking our website, in measuring web traffic, and in statistical purposes</p>	<p>The legitimate interest of our company</p>	<ul style="list-style-type: none"> <li>• demographical data (age, gender)</li> <li>• interests</li> <li>• geographical data (location, language)</li> <li>• behaviour (new or recurring visitor, frequency, session and duration)</li> <li>• technology (web browser and operating system)</li> <li>• network (provider)</li> <li>• mobile device type and operating system</li> <li>• IP address: necessary for the diagnosis of the potential problems occurring while loading</li> </ul>	<p>see below (point 3)</p>

		<p>the website, for the administration of the website and for the demographic data. The IP address is a series of numbers through which Internet users' computers and mobile devices can be clearly identified. IP addresses can even be used to determine the geographical location of the computer user visiting the website. Website addresses and the date and time of visits are, in themselves, not sufficient for identifying the visitor. However, linked with other data (e.g. data provided during registration), they are suitable for drawing conclusions regarding the user.</p>	
<p><b>Company registration on the website</b></p> <p>business and professional communication</p> <p>marketing purposes</p> <p>information requests</p> <p>sending invitations and information about our events (exhibitions, company events, seminars etc.)</p>	<p>Consent</p>	<ul style="list-style-type: none"> <li>• Phone number</li> <li>• E-mail address</li> <li>• Surname of the managing director</li> <li>• Name of the managing director</li> <li>• Function of the managing director</li> <li>• Surname of contact person</li> <li>• Name of contact person</li> <li>• Function of contact person</li> </ul>	<p>until the withdrawal of consent</p>

<b>Newsletter service</b> communication, informing you about our upcoming events and company news	Consent	Full name E-mail address	until unsubscribing from the newsletter
<b>Downloading public procurement data</b>	Legal liability	E-mail address	
<b>Administration, handling of complaints</b> responding to comments and complaints	Legal liability	E-mail address	for 5 years

We only ask for the personal data from our website visitors if they use the company registration function or sign up for the newsletter.

We do not associate the personal data provided for the registration and for using our marketing services, and the identification of our website visitors is not our basic purpose.

You can request additional information regarding the data processing at the e-mail address: [info@tradehouse.hu](mailto:info@tradehouse.hu) or at the postal address: 1095 Budapest, Ipar utca 5. We will send you our reply promptly, within 15 days (and at most within up to 1 month) to the contact address you have provided.

### 3. What are cookies and how do we use them?

Cookies are small files transferred to your computer through using the website, which are saved and stored by your Internet browser.

The majority of the most commonly used Internet browsers (Chrome, Firefox etc.) accepts and allows the download and the use of cookies as a default setting. However, it is up to you to refuse or block them through changing the browser's settings, and you can also delete the cookies stored on your computer. For more information about the use of cookies, see the Help section of your Internet browser.

Some cookies do not require your prior consent. Our website offers brief information about these, e.g. authentication, multimedia player, load balancing and user security cookies, at your first visit.

Our Company informs you about the cookies requiring consent – if data processing already begins with visiting the website – at the start of your first visit and asks for your consent.

Our Company does not use or allow cookies through which third parties may collect data without your consent.

It is not mandatory to accept cookies. However, our Company assumes no responsibility if our website may not work as expected when cookies are disabled.

### What kind of cookies do we use?

Our website uses the web analytics service provided by Google Inc. (Google Analytics), which enables the analysis of website usage. Information about the website usage is usually transferred to and stored on Google servers located in the USA. Google uses this information on behalf of the operator of the website to evaluate the usage of the website and to prepare reports about site activity, as well as to provide other services related to site activity and internet usage for the website operator. The data processed by Google Analytics as part of Google Analytics are not linked with other Google data.

#### 1. Google Analytics #1

Name:	<code>_ga</code>
Does it require consent:	no
Brief description:	for collecting website traffic data; in order to differentiate users
Purpose:	collecting website traffic data
Validity:	2 years

#### 2. Google Analytics #2

Name:	<code>_gid</code>
Does it require consent:	no
Brief description:	for collecting website traffic data; in order to differentiate users
Purpose:	collecting website traffic data
Validity:	24 hours

#### 3. Google Analytics #3

Name:	<code>_gat</code>
Does it require consent:	no
Brief description:	for collecting website traffic data; in order to prevent consecutive page loads in excess
Purpose:	collecting website traffic data (defensive mechanism)
Validity:	<b>1 minute</b>

#### 4. Own session ID

Name:	PHPSESSID
Does it require consent:	no

Brief description:	for differentiating individual user sessions
Purpose:	linking data to the user session on the server page, i.e. data is not lost between consecutive page loads
Validity:	until closing the browser ( <u>addendum</u> : in case of inactivity, depending on server configuration, the data is eliminated sooner, within 30 minutes, on the server page)

For more information on third party cookies, see: <https://www.google.com/policies/technologies/types/>. On data protection, see: <https://www.google.com/analytics/learn/privacy.html?hl=hu>.

#### 4. What else do you need to know about our data processing related to our website?

You provide us your personal data voluntarily during registration or communication with our company. Hence, we ask you to pay particular attention to the authenticity, correctness and accuracy of your personal data, since you are responsible for these. Inauthentic, incorrect or inaccurate data can hinder the use of our services.

If you are providing not your own personal, but other persons' personal data, we assume that you hold the requisite mandate.

You can withdraw your consent to the data processing anytime:

- through a written request for deletion,
- through withdrawing consent to the data processing,
- through withdrawing consent to the processing or use of any data required to be provided during the registration or through asking for it to be locked.

We undertake to register the withdrawal of consent – due to technical reasons – within a 5-workday deadline. However, please note that, we may continue to process some data even after the withdrawal of consent in order to fulfil our legal obligations or to enforce our legitimate interests.

In case of misleading personal data and if a website visitor commits an offence, or attacks the Company's system, we will immediately delete the visitor's personal data while cancelling the visitor's registration, respectively – if necessary – will retain the data for the duration of establishing civil liability or of the criminal proceedings.

#### 5. What do you need to know about our data processing related to direct marketing and to the sending of newsletters?

You can give your consent, through your declaration during the registration, or later, through editing your personal data stored in the registration form to the newsletter and/or to direct marketing (i.e. through explicitly expressing your consent), to the use of your personal data for marketing purposes by our Company. In this case – until the withdrawal of your consent –, your data will be processed for purposes of direct marketing and/or of sending newsletters, and we will send you marketing and other materials, information, offers and/or newsletters (Law XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities, "Grtv.", paragraph 6).

**You can give your consent regarding direct marketing and the sending of the newsletter jointly or separately, and you can withdraw your consent(s) free of charge and at any time.**

Our Company always regards the cancellation of the registration as the withdrawal of consent but does not interpret the withdrawal of consent to the data processing related to purposes of direct marketing and/or newsletter sending as the implicit withdrawal of consent to the data processing related to the website. Consents are always given for a particular purpose. Since the registration on the website and the subscription to the newsletter are separate purposes and databases, these cannot be linked.

We undertake to register the withdrawal of consent or the cancellation – due to technical reasons – within a 5-workday deadline.

## **6. Other issues of data processing**

Your data may be transferred only within the limits prescribed by law. As for our data processors, we ensure through contractual terms that your personal data may not be used for purposes that are contrary to your consent. See point 2 for further information.

## **7. Data transfer to third countries**

Third countries are non-EEA member states. Hence, the data transfer within the EU is not regarded as data transfer to third (or foreign) countries. As such, these specific legislations are not applicable.

Data transfer to third countries may take place for the purpose of concluding brokerage contracts, in order to create a contractual relationship between the data subject and the third country partner of the MNKH. Accordingly, the data transfer is necessary for the execution of the contract between the data subject and the data processor, respectively for implementing pre-contractual measures requested by the data subject.

Courts, prosecution offices and other authorities (e.g. police, tax office, National Authority for Data Protection and Freedom of Information) may contact our company for providing information, data or documents. In this case, we have to fulfil our reporting obligations, but only to the extent indispensable for achieving the purpose of our contacting by the authorities.

The collaborators and employees of our Company, involved in data processing, are entitled to learn about your personal data to a predetermined extent and subject to the condition of confidentiality.

Our Company protects your personal data through technical and other measures, ensures the security and the availability of your data, protects your data from unauthorized access, editing, damage, publication and any unauthorized use.

Our Company verifies the physical access to data in the framework of organizational measures within our buildings, continually trains its employees and preserves the paper-based documents out of reach and adequately protected. In the framework of the technical measures, we use encryption, password protection and antivirus software. Nevertheless, please note that the data transfer via the Internet cannot be regarded as fully safe. Our Company makes every effort to increase the safety of these processes as much as possible. However, we cannot accept full responsibility for the data transfer through our website; but, regarding the data received by our Company, we respect high standards for ensuring the safety of your data and in order to protect unlawful access.

Concerning security issues, we kindly ask your assistance in carefully preserving your website access password and in maintaining its confidentiality.

## **8. What are your rights and possibilities for seeking legal remedies?**

Regarding the data processing, you have the right to:

- request information,

- request the supplementation, rectification, deletion or locking of your personal data,
- object against the data processing and ask for the deletion or locking of your personal data (with the exception of the mandatory data processing),
- seek judicial remedy in court,
- lodge a complaint to the supervisory Authority or initiate a procedure (<https://naih.hu/panaszuegyintezes-rendje.html>).

**Supervisory authority: Nemzeti Adatvédelmi és Információszabadság Hatóság / National Authority for Data Protection and Freedom of Information**

- Seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.
- Postal address: 1530 Budapest, Pf.: 5.
- Phone number: +36 (1) 391-1400
- Fax number: +36 (1) 391-1410
- E-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- Website: <https://naih.hu/>

**At your request, we provide information about:**

- your data processed by our Company or by our Company's mandated data processor
- the source of your data,
- the purpose and the legal basis of the data processing,
- the duration of the data processing, or if this shall not be possible, about the criteria for establishing this duration,
- our data processors' name, address and activity regarding data processing,
- the circumstances, effects and measures taken for countering and preventing personal data breaches,
- the legal basis and the addressee of the data transfer, in the case of transmission of your personal data.

We will provide information in the shortest time possible after the submission of your application, within 5 workdays (and at most within up to 1 month). This information is free of charge, except if you have already submitted an application for information regarding the same data set during the current year. The fees you have paid will be refunded by our Company if our we have processed the data unlawfully, or if the request of information has led to any corrections. We have the right to refuse providing information only in the cases established by the law, under the condition of indicating the specific legal provision and of providing information about the possibilities for seeking judicial remedies in court, respectively about lodging a complaint to the supervisory Authority.

Our Company will inform you and also the parties to whom it has forwarded the personal data about their correction, locking, marking and deleting, except when the lack of notification does not prejudice your legitimate interests.

If we do not fulfil your request for correction, locking or deleting your personal data, we will inform you in writing or – with your consent – through electronic means within 15 days (and at most within up to 1 month) about the reasons of our refusal and also about your possibilities for seeking judicial remedy in court and lodging a complaint to the supervisory Authority.

If you object to the processing of your personal data, our Company will examine your objection in the shortest time possible after its submission (and at most within up to 1 month) and inform you about our decision in writing. If our Company decides that your objection is justified, it will cease to process your personal data – including further data collection and transfer – and lock the data. Furthermore, we will inform all parties to whom we have previously transmitted the personal data referenced by the objection about your objection and about the measures taken to comply with it. These parties are required to take measures in order to enforce the right to objection.



We will refuse to fulfil the request if we prove that the data processing is justified by compelling legitimate grounds which override your interest, rights and freedoms or are linked with the establishment, exercise or defence of legal claims. If you do not agree with our Company's decision, or if we fail to meet the deadline, you may apply to court within 30 days after we have informed you about our decision or of the last day of the deadline.

Lawsuits on data protection fall within the jurisdiction of the court and can be filed at the competent court according to your domicile or residence, depending on your option. Foreign citizen can also file their complaint at the competent supervisory Authority according to their domicile.

**We kindly ask you that, before filing a complaint with the supervisory Authority or the court, please contact our Company for consultation and the quickest possible solution of the problem.**

#### **9. What are the most important laws governing our activity?**

- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data ("GDPR")
- Law CXII of 2011 on the right to informational self-determination and freedom of information ("Infotv.")
- Law V of 2013 on the Civil Code ("Ptk.")
- Law CVIII of 2001 on certain issues of electronic commerce services and information society services ("Eker tv.")
- Law C of 2003 on electronic communications ("Ehtv.")
- Law CLV of 1997 on consumer protection ("Fogyv tv.")
- Law CLXV of 2013 on Complaints and Public Interest Disclosures ("Pktv.")
- Law XLVIII of 2008 on the basic requirements and certain restrictions of commercial advertising activities, "Grtv."

#### **10. Modifications of the data protection policy**

Our company reserves the right to modify the present data protection policy and will adequately inform the data subject about any modifications. Information regarding data processing will be published on the website: [www.kereskedohaz.hu](http://www.kereskedohaz.hu).

Done at Budapest, 24 May 2018