

Téta Kft. - Privacy and Data Protection Policy



Effective: 2018.05.25.

Introduction

This Privacy Statement governs the processing of data in the course of the activities of Téta Kükereskedelmi és Szolgáltató Korlátolt Felelősségű **Társaság**, the legal basis of which is the EU Regulation 2016/679 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 of the European Parliament and of the Council of 2017. Act CL of 2011 on the Rules of Taxation, Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information, Act C of 2000 on Accounting, Act CXVII of 1995 on Personal Income Tax.

In connection with the processing of data, Téta Kft. hereby informs the data subjects about the personal data it processes, the principles and practices followed in the processing of personal data, and the rights of the data subjects.

This Privacy Policy is available at the registered office of Téta Kft., Bolyai János utca 9, 2038 Sóskút, Hungary.

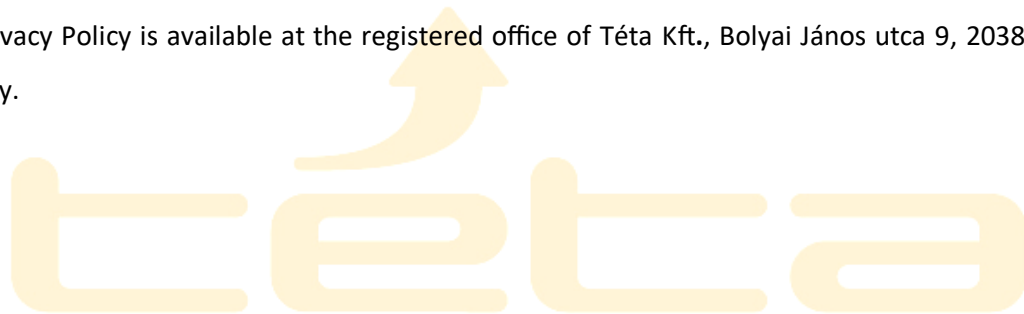


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1. Interpretative provisions

For the purposes of this Policy:

personal data: any data relating to a natural person (identified or identifiable), hereinafter referred to as 'Data Subject', and any inference that can be drawn from the data concerning the data subject; personal data shall retain that quality during processing for as long as the link with the data subject can be established; in particular, a person shall be regarded as identifiable if he or she can be identified, directly or indirectly, by reference to a name, an identifier or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity;

consent: a voluntary and explicit indication of the Data Subject's wishes, based on appropriate information, by which he or she gives his or her unambiguous agreement to the processing of personal data concerning him or her, whether in full or in relation to specific operations;

objection: a statement by the Data Subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data;

controller: the natural or legal person or unincorporated body which determines the purposes for which the data are processed, takes and executes decisions concerning the processing (including the means used) or has them executed by a processor on its behalf;

processing: any operation or set of operations which is performed upon data, regardless of the procedures used, such as collection, recording, organisation, storage, alteration, use, disclosure, transmission, alignment or combination, blocking, erasure and destruction, and prevention of further use of the data; it also includes the taking of photographs, audio or video recordings;

transfer: where the data are made available to a specified third party;

disclosure: where the data are made available to any person;

erasure: making data unrecognisable so that it is no longer possible to recover it;

data blocking: the marking of data with an identifier in order to limit their further processing permanently or for a limited period of time;

data destruction: the total physical destruction of data or the medium on which the data are stored;

data processing: the performance of technical tasks related to data processing operations, irrespective of the method and means used to carry out the operations and the place of application;

data processor: a natural or legal person or an unincorporated body which carries out the processing of personal data on behalf of the controller, including by virtue of a legal act;

data file: the set of data processed in a filing system;

third party: a natural or legal person or unincorporated entity other than the Data Subject, the controller or the processor;

special data: personal data revealing racial or ethnic origin, nationality, political opinions or political party affiliation, religious or philosophical beliefs, membership of an interest group, sex life, health, data concerning a pathological condition or a criminal offence.

2. Data of the data controller

Téta Kft.

Address:	2038 Sósút, Bolyai János utca 9.
Phone number:	+36-30/921-4405
E-mail address:	gyorgyi.viragh@teta.hu
Company registration number:	13-09-073149
Tax number:	12178500-2-13
Main activity:	4690 '08 Wholesale of chemical products

2.1. Data processor

The rights and obligations of the Data Processor in relation to the processing of personal data shall be determined by the Controller. The Data Controller shall be responsible for the lawfulness of the instructions for the processing operations. The Processor shall be responsible for the processing, modification, erasure, transmission and disclosure of personal data within the scope of its activities and within the limits set by the Controller. The Processor shall not use other processors in the performance of its activities. The Processor shall not take any substantive decisions regarding the processing of personal data, shall process personal data of which it becomes aware only in accordance with the Controller's instructions, shall not process personal data for its own purposes and shall store and retain personal data in accordance with the Controller's instructions.

2.2. Data transmission

As a general rule, the Data Controller will not transfer the data processed by the Data Controller to third parties, unless the Data Subject has given his or her explicit consent or unless required by law.

2.3. Data security

The basic forum for recording data is the IT system of the Data Controller. The Controller stores the personal data referred to above at its headquarters.

The Data Controller undertakes to ensure the security of the data in accordance with the provisions of the GDPR and the provisions of Act CXII of 2011 on the Protection of Personal Data (Info Law).

The Data Controller shall ensure the necessary access rights management, internal organisation and technical solutions in the operation of its IT systems to ensure that its data cannot be accessed by

unauthorised persons, deleted from the system or modified by unauthorised persons. The Data Controller shall also enforce data protection and data security requirements in relation to Data Processors.

It keeps records of any data protection incidents and, if necessary, informs the Data Subject and, if necessary, the National Authority for Data Protection and Freedom of Information (NAIH) of the incidents that occur.

Access to personal data shall be granted to persons acting in the interest of the Data Controller, in particular agents and employees, who need to have access for the performance of their activities and who are aware of and have knowledge of the obligations relating to the processing of the data.

The Data Controller shall pay particular attention to ensuring that all its agents and employees are familiar with its internal data protection protocol and process personal data in accordance with it.

The Data Controller undertakes to ensure the security of the data by using the most up-to-date and appropriate equipment and security rules, in particular to ensure that the data cannot be accessed by unauthorised persons or unlawfully disclosed, erased or destroyed. It shall take all reasonable steps to ensure that the data are not accidentally damaged or destroyed. The Data Controller shall impose the same obligation on its employees involved in the processing activities.

Under no circumstances will the Data Controller collect special data, i.e. data concerning racial or ethnic origin, membership of national or ethnic minorities, political opinions or party affiliations, religious or philosophical beliefs, membership of representative organisations, health, pathological addiction, sex life or criminal records.

3. Principles of data management

3.1. Principles governing the processing of personal data

The personal data:

- a) their processing must be lawful, fair and transparent for the data subject (*"legality, fairness and transparency"*);
- b) must be collected only for specified, explicit and legitimate purposes and not be processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes shall not be considered incompatible with the original purpose in accordance with Article 89(1) (*"purpose bound"*);
- c) the purposes of the processing must be adequate, relevant and limited to what is necessary (*"data economy"*);
- d) must be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without delay (*„accuracy"*);
- e) must be 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; personal data may be kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1), subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of data subjects as provided for in this Regulation (*„limited shelf life"*);
- f) must be handled in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, by using appropriate technical or organisational measures (*„ integrity and confidentiality"*).

The Data Controller is responsible for compliance with the above and declares that its processing is in accordance with the principles set out in this section:

- The Data Controller shall process data that constitute personal data only with the consent of the Data Subject.
- In its data processing activities, the Data Controller shall endeavour to ensure that the provisions of the law applicable to data processing and of this Policy, in particular the purpose limitation principle, are complied with continuously and fully.
- The Data Controller shall process the data it obtains in the course of the establishment and performance of contracts in a purpose-oriented manner, as set out in this Policy, for the duration of the contracts.
- The Data Controller hereby informs its customers that their personal data provided by means of orders or other technical means will be recorded by the Data Controller. These data will be treated confidentially and will not be disclosed to third parties.
- The Data Controller will not use the personal data processed to send advertising material, offers or information for direct marketing purposes. It only sends such messages to its users and customers if they have expressly authorised it to send them a newsletter by electronic means. The data provided during the subscription to the newsletter that may be provided during the browsing of the website will be treated confidentially by the Operator, will not be disclosed to third parties and the possibility to unsubscribe will be provided at the bottom of each newsletter sent.

3.2. Regulatory compliance

The Data Controller's data management principles comply with the applicable data protection legislation, in particular:

- Act LXIII of 1992 - on the protection of personal data and the disclosure of data of public interest
- Act LVI of 1992 - on the disclosure of citizens' personal data and address
- Act CXIX of 1995 - on the processing of name and address data for research and direct marketing purposes
- Act CVIII of 2001 – on certain aspects of electronic commerce services and information society services

4. Use of personal data for employees

Name of the person concerned	for the preparation of documents required for the establishment of the employment relationship, working time records, payroll tasks
Place and date of birth of the person concerned	for the preparation of documents required for the establishment of the employment relationship, working time records, payroll tasks
Name of the mother of the person concerned	for the preparation of documents required for the establishment of the employment relationship, working time records, payroll tasks
Address of the person concerned	for the preparation of documents required for the establishment of the employment relationship, working time records, payroll tasks
Number of the identity card, social security card and address card of the person concerned	for the preparation of documents required for the establishment of the employment relationship, working time records, payroll tasks
Tax identification number of the person concerned	for the preparation of documents required for the establishment of the employment relationship, working time records, payroll tasks
Identification number of the person concerned	to prepare the documents needed to establish an employment relationship
Phone number of the person concerned	to assign contact details and, in some cases, to be indicated on the website for contact purposes
E-mail address of the person concerned	to assign contact details
Signature of the person concerned	for the preparation of the documents necessary for the establishment of the employment relationship; the Data Subject also certifies in a separate declaration that he or she has read the general and data protection information of Téta Kft. and consents to the processing of data in accordance with the terms of the information

Date of birth, social security number and tax number of the children of the person concerned	for the preparation of the documents necessary for the granting of additional leave and family allowances to the Data Subject for his other children, for payroll tasks
Tax number of the spouse of the person concerned	for the preparation of documents necessary for the provision of the family allowance claimed by the Data Subject, for payroll tasks

Legal basis for data processing: the EU Regulation 2016/679 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 95/46/EC, Act C of 2000 on Accounting, Act I of 2012 on the Labour Code and Act CXVII of 1995 on personal income tax.

5. Duration of data processing

Activity	Data processed	Purpose of data processing	Legal basis for data processing	Duration of storage
Wholesale trade services of chemical products	Name, telephone number, billing details, e-mail address	Completion of a contract	GDPR Article 6(1)(c)	At least 8 years
Contact details	Name, telephone number, billing address, e-mail address	Appointments, cancellations, data changes	GDPR Article 6(1)(a)	1 year
Accounting activity	Name, address, tax number	Issuing an invoice in connection with the provision of a service	GDPR Article 6(1)(a)	At least 8 years
Complaint handling	Name, telephone number, e-mail address, home address	Handling of complaints	GDPR Article 6(1)(a)	5 years
Additional data storage				Retention period for the documents on which the employment relationship is based: 50 years Retention of data relating to the performance of a contract: 10 years after the year in question

6. Rights of the Data Subject and how to enforce them

6.1. Right to information

The Data Subject may request information from the Data Controller about the processing of his/her personal data, request the rectification of his/her personal data, and request the erasure or blocking of his/her processed data. At the Data Subject's request, the Controller shall provide information about the data processed by the Controller or by a processor on its behalf, the purposes and legal basis of the processing, its duration, the name, address (registered office) and activities of the Processor in relation to the processing, as well as the persons who receive or have received the data and the purposes for which the data are received. 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 30 days. The information shall be provided free of charge if the person requesting the information has not yet submitted a request for information to the Controller for the same set of data in the current year. In other cases, a fee may be charged. The fee already paid shall be refunded if the data have been unlawfully processed or if the request for information has led to a rectification. The Data Controller may only refuse to provide information to the Data Subject if this is permitted by the Info Law. The Data Controller shall inform the Data Subject of the reasons for the refusal to disclose. The Data Controller shall notify the Commissioner for Fundamental Rights annually of any refused requests.

6.2. Correction or deletion of data

If the personal data is not accurate and the accurate personal data is available to the Data Controller, the Data Controller shall correct the personal data.

Personal data must be deleted if:

- its processing is unlawful,
- the Data Subject requests so in accordance with the applicable law,
- it is incomplete or incorrect and cannot be lawfully corrected, provided that cancellation is not precluded by law,
- the purpose of the processing has ceased or the statutory time limit for storing the data has expired,
- it has been ordered by a court or the Data Protection Commissioner.

Rectification and erasure must be notified to the Data Subject and to all those to whom the data were previously disclosed for processing. The notification may be omitted if this does not harm the legitimate interests of the Data Subject in relation to the purposes of the processing.

6.3. Right to object

The Data Subject may object to the processing of his or her personal data if the processing (transfer) of the personal data is necessary solely for the purposes of the Data Controller, the recipient or for the exercise of a right or legitimate interest, unless the processing is required by law. The Data Controller shall, within the shortest possible period of time from the date of the request, but not later than 15 days, examine the objection, decide on its merits and inform the applicant in writing of the outcome of the objection, with the simultaneous suspension of the processing. If the objection is justified, the Data Controller shall terminate the processing, including any further collection and transmission of data, and block the data, and notify the objection and the measures 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 action to enforce the right to object. If the Data Subject does not agree with the decision of the controller or if the controller fails to comply with the 15-day time limit, the Data Subject may, within 30 days of the notification or the last day of the time limit, take the matter to court.

6.4. Information on legal remedies

The data protection supervisory authority in Hungary is the National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9-11., ugyfelszolgalat@naih.hu).

Judicial: data protection litigation falls under the jurisdiction of the courts. A lawsuit may also be brought before the court of the place of residence or domicile of the data subject, at the data subject's choice.

Clause

Pursuant to Regulation 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation will apply from 25 May 2018.

Téta Kft.

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Phone number:	+36-30/921-4405
E-mail address:	gyorgyi.viragh@teta.hu
Company registration number:	13-09-073149
Tax number:	12178500-2-13
Main activity:	4690 '08 Wholesale of chemical products

For questions regarding data processing and customer rights, you can make an appointment with the data controller Györgyi Virágh at +36-30/921-4405.

The Data Subjects accept the Privacy Notice and consent to the processing of the data as described above.