

PRIVACY POLICY

Effective from: 31.01.2023.

Personal data of natural persons is handled while observing all regulations of the 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 (**'GDPR'**) and Act CXII 2011 on the Right of Informational Self-Determination and on Freedom of Information (**'Privacy Act'**).

The Privacy Policy aims to ensure a concise, transparent, clear and accessible data management rules-set for all data subjects.

1. The controller

The controller

Name: RI Management Consulting Korlátolt Felelősségű Társaság

Seat: 15 Dózsa György utca Nagykovácsi, 2094

Corporate registration number: 13-09-208460 (Commercial Court of the Budapest Regional Tribunal)

Tax number: 28814108-2-13

Email: info@ri.co.hu

2. Updating and access to the regulation

The controller retains the right to unilaterally modify the Privacy Policy with the modifications taking effect immediately thereafter, observing all related provisional restrictions and notifying all data subjects in a timely manner where appropriate. Modification of the Privacy Policy may be required especially in cases when changes in related provisions, data protection authority practices, business or employee needs occur, or when new activities requiring data handling or newly identified security threats appear, or when feedback from data subjects makes it necessary. The controller may use available contact details in order to communicate or contact data subjects for issues related to the Privacy Policy or other data protection issues, as well as other issues. E.g. at the request of a data subject, the controller may send them the current version of the Privacy Policy or verify that other data subjects are familiar with its content.

3. Specific data protection conditions

Under certain circumstances, specific data protection conditions may be applied of which data subjects are notified separately. This includes the Cookie Policy applied at the website of the controller.

Data subjects or other parties always have to provide personal data to the controller in accordance with related provisions. This includes having appropriate and informed consent or other legal basis for providing personal data (e.g. for contact persons or relatives). If the controller becomes aware of personal data of a data subject being provided without their consent or other legal basis, that data will immediately be deleted and the data subject is entitled to exercise rights and appeals defined in the Privacy Policy. The controller is not liable for damages, losses or grievances resulting from violating above commitments or declarations of data subjects.

4. Scope, reason, legal grounds and duration of handling data

Handled data	Reason	Legal grounds	Duration
Name, phone number, e-mail address	Identification, contact, coordination	Authorization by the data subject [GDPR Article 6(1) point a)]	until the data subject revokes consent
Message	Necessary for the development and customisation of the offer.	Concluding contracts with data subjects [GDPR Article 6(1) point b)]	until the data subject revokes consent
Date of the request	Perform a technical operation	Compliance with legal obligations for Controllers [GDPR Article 6(1) point c)]	until the data subject revokes consent

The data subject shall have the right to object, on grounds relating to their particular situation, at any time to the processing of personal data. In this case, the controller ceases handling affected data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests or fundamental rights and freedoms of the data subject, or are connected to submitting, enforcing or protecting legal claims.

Data subjects provide personal data to the controller themselves, the controller shall not collect or store personal data about affected parties from other sources.

The controller does not perform automated data handling (including profiling).

5. Forwarding data and data processors

The controller uses services of the following contracted partners for performing data handling activities. Contracted partners act as ‘data handlers’, handling personal data defined in the Privacy Policy on behalf of the controller.

Data Processor	Activities
Google Ireland Limited (Registered Number: 368047; Gordon House, Barrow Street Dublin 4 Ireland)	We inform data subjects that due to using the cloud services provided by Google Ireland Limited (Registered Number: 368047; Gordon House, Barrow Street Dublin 4 Ireland), personal data of data subjects stored online may be forwarded to third countries outside of the EU, which is a direct consequence of the operation of said cloud services. The Privacy Policy of Amazon Google Ireland Limited as data processor is available at the following link: https://policies.google.com/privacy?hl=en-IE
Websupport Magyarország Kft. (1132 Budapest, Victor Hugo utca 18-22.) Tárhelypark márkanéven	Accounting services, during which it is provided full access to corporate, contract and HR data.

By accepting the Privacy Policy, data subjects expressly consent to their personal data being forwarded to third countries outside the EU.

Personal data can be accessed by authorized employees of the controller who are obliged to keep all personal data of data subjects they have accessed private and handle them accordingly.

6. Data protection

The controller shall implement and execute data handling processes in order to ensure the privacy of data subjects. For this, the controller shall follow strict security regulations for storing and forwarding data of data subjects and to prevent loss, destruction and damage of these data.

The controller shall store electronic personal data in a separate room, on a key-locked and password protected server, or on Google Drive cloud services. In case of paper-based data, storing shall be done in a separate, closed room in the offices of the controller.

7. Rights of data subjects

Right to information

The controller shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

Right of access

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and related relevant information

The controller provides information on the above within up to 1 month after receiving such requests.

Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

Right to erasure

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, except for reasons prescribed by law:

- 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 where there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;

- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- 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; or
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

If data handling is restricted, personal data can only be handled by the explicit authorization of the affected party, or to establish, exercise or defend legal claims, or to defend legal claims of other natural persons or legal entities, or the important general interest of the EU or its member states.

Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. In case of an objection, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

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 him or her or similarly significantly affects him or her.

Right to withdrawal

Data subjects are entitled to withdraw their authorizations any time.

Right to apply to the courts

Each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed. The court acts in this case as a matter of urgency.

Data Protection Authority Processes

Complaints against the controller may be submitted to the following organization:

Name: National Agency for Data Protection

Seat: 9-11 Falk Miksa utca Budapest, 1055

Mail address: Pf.: 9 Budapest, 1363

Phone: +36 (30) 683-5969; +36 (30) 549-6838; +36 (1) 391 1400

Fax: +36 (1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

8. Other provisions

Only the data subject is responsible for the provided data. The controller shall not be responsible for incorrect or false data or data containing personal or other information of third persons. If a data subject does not provide their own personal data they have to possess the appropriate authorization for that.

Information on data handlings not included in this regulation is provided by the controller at the time of recording those data.

Court, prosecutors, investigating, administrative offences and administrative authorities, the National Agency for Data Protection, the National Bank of Hungary and other legally authorized organizations may require information, data or documents from the controller. The controller only provides personal data in a quantity and to an extent which is necessary to satisfy the goals of the request by the authorities, in case they provided an exact definition of the goal and the scope of data.

The controller retains the right to change the Privacy Policy with the obligation of notifying the data subjects about changes in a timely manner.