# CSOM-2001. Trade and Service Limited Liability Company(hereinafter the Company)

## **Privacy Policy and information**

#### Scope

Information on the handling of existing and future legal entity and taxable individuals, private entrepreneurs, as well as other parteners' personal data, their information and self determination rights regarding to the **Regulation (EU) No 2016/679 of the European Parliament** (hereinafter the GDPR Regulation) entered in force from 25 May 2018.

#### Handled personal data

The processed personal data by the Company is as follows: name of the partner, telephone and email availability. The personal data processing is based on the company's legal obligation (data processing is necessary to perform a contract with a partner and to fulfill a legal obligation); as well as (for prospective partners) is based on a self contribution of partners.

#### Data controllers, data processors

The personal data of the partner are handled by the administrators of the Company, represented by Edit BÁNKÚTI, managing director, (Adress: 1181 Budapest, Zádor utca 16.) authorized by the Company. The personal data of the partner is also processed by the Company's accountant, auditor and developer of the Management System, data processors. Data controllers and data processors are subject to confidentiality.

#### Data transmission

The authorities requesting direct information on the content of the relationship with the partner or maintained, such as: National Taxation and Customs Administration (NAV), Hungarian State Treasury(Magyar Államkincstár), Central Statistical Office (Központi Statisztikai Hivatal); as well as lawyers, lawyers and their substitutes representing the Company. The personal data transmission may only be based on the fulfillment of bundling based on legal obligation. The recipients are bounded by confidentiality obligation.

#### Personal Data Protection Officer

Designation not required

#### The location of data processing

The personal data available on paper is stored at CSOM-2001. Kft., located at 1181 Budapest, Zádor utca 16.

Non-paper-based personal data are stored by the ADMIN (management system), accounting software and the server of the Company, to which the administrators, administrators of the Company, accountants, auditors and the system administrator have access.

# Legal basis for data processing

The processing of personal data, in case of existing legal relationship is based on international and domestic legal and regulatory provisions, in particular the GDPR regulation and the Hungarian Act XCII of 2003 on the Rules of Taxation; on the other hand (in case of future legal relationship) is based on self contribution.

# The purpose of data processing

Compliance with international and domestic legal and regulatory provisions, establishing a future legal relationship.

# Personal Data Retention Time

The retention time of personal data processing is performed up to the termination of the legal relationship, but at least for a period of 8 years, pursuant to Article 169 (1) of Act C of 2000 on Accounting Act (hereinafter: Accounting Law).

In the case of future legal relationship, if the partner does not contribute to data processing or does not send a statement that contributes to the Company within 3, ie within three working days, then the Company will delete all the personal data within one working day.

## Rights of the person concerned

The affected partner may apply for access, rectification or modification of the personal data relating to him / her, as well as may apply for to whom and based on what their personal data was transferred to, and in case of modification of the law, their deletion or limitation of data processing.

In the case of a future legal relationship, if the partner does not contribute to their data processing, the Company will delete the personal data provided within 1 working day, (ie one working day) from the receipt of the validated cancellation request.

In case of that the unauthorized processing of the personal data is revealed by one of the partners, he or she may appeal to the Company and then to the National Data Protection and Information Authority (Nemzeti Adatvédelmi és Információszabadság Hatóság), and finally to the Municipal Court of Budapest (Fővárosi Törvényszék), with a complaint or remedy.

#### Data processing activity register

The data controller records the data processing activity electronically in line with the requirements of this information leaflet. The transfer of personal data relating to the affected party is also carried out electronically (redirects) to the addressee(s).

Budapest, 23 May 2018.

Edit BÁNKÚTI, managing director of CSOM-2001 Ltd.

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