

## **DATA PROTECTION RULES PART IV.**

### **INFORMATION ABOUT THE NATURAL PERSONAL DATA MANAGEMENT BY THE COMPANY AND THE RIGHTS OF THE DATA SUBJECT**

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#### **INTRODUCTION**

*1. 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 and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter „Regulation”) provides that the controller shall take appropriate measures to provide any information and any communication relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language and The controller shall facilitate the exercise of data subject rights.*

*2. Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information also provides the prior notification of the data subject.*

*3. By the information below, we comply with our legal obligation.*

*4. The information should be published on the company's website or posted on the bulletin board at the head office of the controller.*

#### **CHAPTER I. DESCRIPTION OF THE CONTROLLER**

5. Part I. of the Data Protection Rules contains the description of the controller.

#### **CHAPTER II. DESCRIPTION OF THE PROCESSORS**

**7.** Processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller (Regulation, Article 4 (8)). The use of the processor does not require the prior consent of the data subject, but it is necessary to inform them.

**8.** Part I. of the Data Protection Rules contains the description of the processors.

### **CHAPTER III. INFORMATION ABOUT THE INDIVIDUAL DATA PROCESSING**

**9.** The following information describes the key data processing activities of the controller for data processing purposes.

**10.** The controller performs the following, most important data processing in connection with his employment relationship.

**10.1.** Work and personal register

**10.2.** Data processing in connection with the medical examinations of workers

**10.3.** The processing of data of workers who apply for a job, their applications, CVs.

**10.4.** Data processing related to the control of the funds provided by the employer

**10.5.** Data processing of the controller in connection with camera surveillance at the workplace - which must be used when he actually performs such activity.

**11.** The controller carries out the following main data processing in connection with civil law contracts and contract partners.

**11.1.** Customer information: processing data of contractors, contact persons - registration of customers, suppliers.

**11.2.** Data processing in connection with individual other services.

**11.3.** The processing of data of members, owners, shareholders and board members.

**12.** The controller performs the following key data processing as a fulfillment of legal obligation.

**12.1.** Data processing to fulfill tax and accounting obligations.

**12.2.** Data processing in connection with driving registration and keeping the logbook

**12.3.** Data processing related to payouts

**12.4.** Data processing for documents of lasting value according to the archive law

**13.** The controller has regulated the data processing based on the consent of the data subject, such data processing can, for example, be made by the controller, if he carries out direct marketing activities or the organization of a gift lottery.

The legal basis for the processing: the consent of the data subject, which is indicated by the recognition of the data protection regulations, the voluntary disclosure of the data of the data subject and by ticking on a box before the privacy policy and by sending the message, by e-mail sending by sending the e-mail. An already pre-ticked box is prohibited. Before submitting the message, the information about the data processing must be available through a link.

**14.** In chapter V of this information sheet you will find information about the data processing on the website of the controller.

#### **CHAPTER IV. INFORMATION ABOUT THE DATA SECURITY MEASURES**

**15.** For the safety of the personal data the controller has taken in relation to his data processing all technical and organizational measures for all purposes and legal bases and has developed the procedural rules necessary for the implementation of the Regulation and the Information Act.

**16.** The controller protects the data by suitable measures against accidental or unlawful destruction, loss, alteration, damage, unauthorized publication or unauthorized access.

#### **CHAPTER V. INFORMATION ABOUT THE DATA PROCESSING ON THE WEBSITE**

##### **17. DATA PROCESSING OF VISITORS - INFORMATION ABOUT THE USE OF COOKIES**

**The website of General Printing House does not use cookies.**

##### **18. DATA PROCESSING ASSOCIATED WITH THE FOLLOWING ITEMS OF THE WEBSITE: QUOTATION REQUEST, CONTACT, CUSTOMER SERVICE, TECHNICAL ASSISTANCE**

**18.1.** These rules apply when the website has contact, customer service or other features with the same content.

**18.2.** The circle of those affected: a visitor of the website who sends a message or an e-mail through using the contact menu, etc.

**18.3.** The processed data circuit: name, e-mail address, telephone number, or other unsolicited data specified by the user in the message.

**18.4.** Purpose of the data processing: the securing of the contact of the visitor with the controller, execution of a customer service, request for quotation, processing of complaints, information about the operation of the website, analysis of the website, placement, presentation and submission of advertisements.

**18.5.** The legal basis for the processing: the consent of the data subject, which is indicated by the recognition of the data protection regulations, the voluntary disclosure of the data of the data subject and by ticking on a box before the privacy policy and by sending the message, by e-mail sending by sending the e-mail. An already pre-ticked box is prohibited. Before submitting the message, the information about the data processing must be available through a link.

**18.6.** Recipients: those who can access this data: controller's sales and service personnel, IT processors.

**18.7.** Information about the processors: the company's IT service provider (Data Protection Rules Part I.)

**18.8.** Duration of data storage: the specified data will be deleted within one year after the contact is made.

## **19. DATA PROCESSING ASSOCIATED WITH A REGISTRATION ON THE WEBSITE**

The website of General Printing House has no registration or a function with the same content.

## **20. DATA PROCESSING IN CONNECTION WITH NEWSLETTER SERVICES**

The website of the General Printing House has no newsletter subscription, sending or with a function with the same content.

## **21. DATA PROCESSING IN CONNECTION WITH WEBSHOP**

The website of the General Printing House does not have a webshop or a function with the same content.

## **22. THE RIGHTS OF THE DATA SUBJECT**

The data subjects may exercise the rights described in the following chapter.

### **CHAPTER VI. INFORMATION ABOUT THE RIGHTS OF THE DATA SUBJECT**

#### **23. The rights of the data subject briefly summarized:**

1. Transparent information, communication and facilitating the exercise of the rights of the data subject
2. Right to prior notification – where personal data are collected from the data subject
3. Informing the data subject and providing information - where personal data have not been obtained from the data subject
4. Right of access by the data subject
5. Right to rectification
6. Right to erasure ('right to be forgotten')
7. Right to restriction of processing
8. Notification obligation regarding rectification or erasure of personal data or restriction of processing
9. Right to data portability
10. Right to object
11. Automated individual decision-making, including profiling
12. Restrictions
13. Communication of a personal data breach to the data subject
14. Right to lodge a complaint with a supervisory authority (Right of appeal to a supervisory authority)

15. Right to an effective judicial remedy against a supervisory authority
16. Right to an effective judicial remedy against a controller or processor

## **24. The rights of the data subject detailed and complete:**

The following is complete information about the rights of the data subject.

### **1. Transparent information, communication and facilitating the exercise of the rights of the data subject**

**1.1.** The controller shall take appropriate measures to provide any information and any communication relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.

**1.2.** The controller shall facilitate the exercise of data subject rights.

**1.3.** The controller shall provide information on action taken on a request to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended, for a further period of two months, under the conditions laid down in the Regulation, by which the data subject shall be informed.

**1.4.** If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

**1.5.** The controller provides the information and communications on the data subject's rights free of charge, but charges may be required in the cases described in the Regulation.

The detailed rules can be found in Article 12 of the Regulation.

### **2. Right to prior notification – where personal data are collected from the data subject**

**2.1.** The data subject is entitled to receive facts and information related to the processing prior to data processing.

In this context, the following should be communicated to the data subject:

- a) the identity and the contact details of the controller and of the controller's representative;
- b) the contact details of the data protection officer, where applicable;
- c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
- d) in the case of processing based on the protection of a legitimate interest, the legitimate interests pursued by the controller or by a third party

- e) the recipients - to whom the personal data are communicated - or categories of recipients of the personal data, where applicable
- f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation.

**2.2.** The controller should provide the data subject with the following further information in order to ensure fair and transparent processing:

- a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- c) in the case of processing, whereby the data subject has given his consent, the existence of a right to withdraw the consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal
- d) the right to lodge a complaint with a supervisory authority;
- e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
- f) 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.

**2.3.** Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.

The detailed rules on the right to prior notification can be found in Article 13 of the Regulation.

### **3. Informing the data subject and providing information - where personal data have not been obtained from the data subject**

**3.1.** Where personal data have not been obtained from the data subject, the controller should inform the data subject about the facts and information described in point No. 2 at the latest within one month after obtaining the personal data; if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed, and about the categories of personal data, the source of the personal data and, if applicable, whether they come from publicly available sources.

**3.2.** Regarding the other rules, the information in point 2 (Right to prior notification) is relevant.

The detailed rules can be found in Article 14 of the Regulation.

#### **4. Right of access by the data subject**

**4.1.** 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 to the related information. (Regulation, Article 15.)

**4.2.** Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

**4.3.** The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

The detailed rules on the right of access by the data subject can be found in Article 15 of the Regulation.

#### **5. Right to rectification**

**5.1.** 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.

**5.2.** Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

The detailed rules can be found in Article 16 of the Regulation.

#### **6. Right to erasure ('right to be forgotten')**

**6.1.** 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:

- 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 referred to in Article 8(1).

**6.2.** The Right to erasure shall not apply when the processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c) for reasons of public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to in paragraph 1 (Right to erasure) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

The detailed rules on the right to erasure can be found in Article 17 of the Regulation.

## **7. Right to restriction of processing**

**7.1.** Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

**7.2.** 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;
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

**7.3.** A data subject shall be informed by the controller before the restriction of processing is lifted.

The detailed rules can be found in Article 18 of the Regulation.

## **8. Notification obligation regarding rectification or erasure of personal data or restriction of processing**

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.



The detailed rules can be found in Article 19 of the Regulation.

## **9. Right to data portability**

**9.1.** Under the conditions described in the regulation 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, where:

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

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

**9.3.** The exercise of the right referred to in paragraph 1 (Right to data portability) of this Article shall be without prejudice to Article 17 (Right to erasure ('right to be forgotten')). That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This right shall not adversely affect the rights and freedoms of others.

The detailed rules can be found in Article 20 of the Regulation.

## **10. Right to object**

**10.1.** 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. 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. As part of the balance of interests, the controller reveals the content of the legitimate interest and examines to what extent the enforcement of the legitimate interest affects the interests or fundamental rights and freedoms of the data subject. Then one has to consider whether the latter take precedence over the legitimate interests of the data subject, especially if it is a child. If, during the balancing of interests, the interests of the data subject require the protection of personal data, data processing can not proceed.

**10.2.** Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

**10.3.** At the latest at the time of the first communication with the data subject, these rights shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

**10.4.** The data subject may exercise his or her right to object by automated means using technical specifications.

**10.5.** Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

The detailed rules can be found in Article 21 of the Regulation.

## **11. Automated individual decision-making, including profiling**

**11.1.** 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.

**11.2.** This right shall not apply if the decision:

- a) is necessary for entering into, or performance of, a contract between the data subject and a data 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; or
- c) is based on the data subject's explicit consent.

**11.3.** In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

The detailed rules can be found in Article 22 of the Regulation.

## **12. Restrictions**

Union or Member State law to which the data controller or processor is subject may restrict by way of a legislative measure the scope of the obligations and rights (Articles 12 to 22 and Article 34, as well as Article 5) in so far as its provisions correspond to the rights and obligations provided for in Articles 12 to 22, when such a restriction respects the essence of the fundamental rights and freedoms.

The detailed rules can be found in Article 23 of the Regulation.

## **13. Communication of a personal data breach to the data subject**

**13.1.** When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. The communication to the data subject shall describe in clear and plain language the nature of the personal data breach and contain at least the following information should be communicated:

- a) communicate the name and contact details of the data protection officer or other contact point where more information can be obtained;
- c) describe the likely consequences of the personal data breach;
- d) describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

**13.2.** The communication to the data subject shall not be required if any of the following conditions are met:

- a) the controller has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- b) the controller has taken subsequent measures which ensure that the high risk to the rights and freedoms of data subjects referred to in paragraph 1 is no longer likely to materialise;
- c) it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

The detailed rules can be found in Article 34 of the Regulation.

#### **14. Right to lodge a complaint with a supervisory authority (Right of appeal to a supervisory authority)**

Every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy.

The detailed rules can be found in Article 77 of the Regulation.

#### **15. Right to an effective judicial remedy against a supervisory authority**

**15.1.** Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them.

**15.2.** Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the supervisory authority which is competent does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

**15.3.** Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

**15.4.** Where proceedings are brought against a decision of a supervisory authority which was preceded by an opinion or a decision of the Board in the consistency mechanism, the supervisory authority shall forward that opinion or decision to the court.

The detailed rules can be found in Article 78 of the Regulation.

## **16. Right to an effective judicial remedy against a controller or processor**

**16.1.** Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority, 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 as a result of the processing of his or her personal data in non-compliance with this Regulation.

**16.2.** Proceedings against a controller or a processor shall be brought before the courts of the Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the Member State where the data subject has his or her habitual residence, unless the controller or processor is a public authority of a Member State acting in the exercise of its public powers.

The detailed rules can be found in Article 79 of the Regulation.

Szeged, 25th May, 2018

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