

**DATA MANAGEMENT INFORMATION
ABOUT THE RIGHTS OF THE NATURAL PERSON CONCERNED
IN RESPECT OF THE MANAGEMENT OF HIS PERSONAL DATA**

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INTRODUCTION

The 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 called: Regulation) prescribes that the data processor takes appropriate measures to supply every single information on the processing of the personal data to the concerned person in a concise, intelligible and easy available way, clearly formulated and easy to understand, additionally that the data processor supports exercising the rights of the concerned person.

The liability of previous information of the concerned person is also prescribed in the CXII. Law 2011 about the self-determination right and the freedom of information.

We meet this responsibility prescribed by the provision of law with the information as to be read below.

The information must be published on the website of the company or sent to the person concerned on request.

CHAPTER I. DENOMINATION OF THE DATA MANAGER

Publisher and data manager of this information at the same time:

Company name: SZINKRON KFT

Seat: 2800 Tatabánya, Széchenyi út 18.

Company registration number: 11-09-000977

Tax number: 10388703-2-11

Representative: István Hoffart

Phone number: 34/511-980

Fax number: 34/324-591

E-Mail-address: szinkronkft@t-online.hu

Homepage: www.szinkron.com

(hereinafter called: **Company**).

CHAPTER II. DENOMINATION OF THE DATA PROCESSORS

Data processor: the natural person or a legal entity, organisation of executive power, agency or any other organ, managing personal data on behalf of the data manager; (8. of Article 4 of the Regulation).

It is not necessary to have the previous consent of the concerned person to employ a data processor but it is necessary to inform him. Accordingly we provide the following information:

1. Postal services, delivery, parcel delivery

These data processors receive the personal data from our Company required for the delivery of the ordered product (name, address, phone number of the concerned person) and using these they deliver the product.

This service provider:

Courier service

Company name: DPD Hungária Kft.

Seat: 1158 Budapest, Késmárk utca 14. building B.

Company registration number: 11-09-888141

Tax number: 13034283-2-4

Phone number: 06-1-501-6200

CHAPTER III. ASSURANCE OF LEGALITY OF THE DATA MANAGEMENT

2. Data management on the basis of the consent of the concerned person

(1) If the Company intends to perform a data management on the basis of consent, the consent of the concerned person to manage his personal data should be requested with the content and information according to the data requiring form specified in the data management statutes.

(2) It is also considered as consent if a square concerning this is ticked off by the concerned person in the course of viewing of the internet homepage of the Company, in the course of using the services in connection with the information society he makes technical settings concerning this, as well as any declaration or action that, in the given relation, that clearly indicates the consent of the concerned person to the intended management of his personal data. Thus silence, the square ticked off in advance or no action are not considered as consent.

(3) The consent includes all data management activities performed in the interest of the same aim or aims. If data management serves for several aims at the same time, then consent must be provided for all data management aims.

(4) If the concerned person provides his consent within the scope of a declaration in writing that concerns other matters too – for example concluding of a sales, service contract –, the application for the consent must be performed in an expressly discerned way from the other matters, in an intelligible and easy available form, in a clear and simple language. Any part of such declaration including the consent of the concerned person violating the Regulation has no binding force.

(5) The Company can not connect the conclusion, the fulfilment of a contract with the providing of consent of such personal data management that are not necessary for fulfilling the contract.

(6) The withdrawal of the consent must be made possible in the same simple way like its provision.

(7) If the data collection was performed with consent of the concerned person, then, for the lack of different provisions of the law the data manager can manage the data for the aim of fulfilment of the legal obligations concerning him without further separate consent, and after withdrawal of the consent by the concerned person, respectively.

3. Data management based on the fulfilment of a legal obligation

(1) In case of data management based on the fulfilment of a legal obligation the provisions of the law serving as base for the scope of the data to be managed, the aim of the data management, the period of time of data storage, the addressees is standard.

(2) Data management based on legal title of the fulfilment of a legal obligation is independent from the consent of the concerned person, as data management is specified by the law. In this case, prior to beginning the data management it must be reported to the concerned person, that the data management is compulsory, additionally, prior to beginning the data management the concerned person must be informed expressly and detailed about all facts connected with the management of his data, so especially about the aim and the title of data management, the person authorized for data management and data processing, the period of time of data management, if the personal data of the concerned person are managed by the data manager on the basis of his legal obligation and about that, who can get acquainted with the data. The information must also include the rights and the legal remedy possibilities of the concerned person. In case of a compulsory data management the information can also be performed by publishing the reference to the provisions of law containing the above information.

4. Supporting the rights of the concerned person

The Company is liable to ensure exercising of the rights of the concerned person in the course of each data management.

CHAPTER IV.

DATA MANAGEMENT OF THE VISITORS ON THE HOMEPAGE OF THE COMPANY – INFORMATION ON USING OF COOKIES

1. The visitors of the website must be informed about using of cookies and for this – with the exception of the technically absolutely indispensable session cookies – their consent must be requested.

2. General information on the cookies

2.1. The cookie is a data sent by the visited website to the browser of the visitor (in a form of variable name – value) for it can store this and later the same website can load its content. The cookie can have validity, it can be valid until the browser is closed, but also for an unlimited time. Later, in case of each HTTP(S) search these data shall be sent to the server by the browser. Thus the data on the machine of the user will be modified.

2.2. Cookies insuring performance: although they have not much to do with the “performance”, those cookies are usually called this way, that collect information about the behaviour, the clicks, the time spent by the user on the visited website. These are typically applications of third parties (for example Google Analytics, AdWords).

You can gather information on Google Analytics cookies here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

You can gather information on Google AdWords here:

<https://support.google.com/adwords/answer/2407785?hl=hu>

3. Information about the cookies used on the homepage of the Company and the *data created during visiting this*

3.1. Cookies ensuring performance

They collect information about the behaviour, the clicks, the time spent by the user on the visited website. These are typically applications of third parties (for example Google Analytics, AdWords).

The title of the data management: consent of the concerned person.

The aim of the data management: analysis of the website, sending of advertisement offers.

CHAPTER V. INFORMATION ABOUT THE RIGHTS OF THE PERSON CONCERNED

I. The rights of the concerned person are summarized as follows:

1. Transparent information, communication and supporting of exercising the rights of the person concerned.
2. The right to gather previous information – if the personal data are collected from the person concerned.
3. Information of the person concerned and the information to be made available, if the personal data are obtained not from him.
4. The right of the person concerned to access.
5. The right to correction.
6. The right to cancel (“the right to forget”).
7. The right to restrict the data management.
8. Notification obligation connected with the correction or cancelling of personal data and restricting the data management, respectively.
9. The right to data portability.
10. The right to protest.
11. Automated decision making in individual matters including profiling.
12. Restrictions.
13. Information of the person concerned about the data protection incident.
14. The right to lodge a complaint at the supervisory authority (the right to the official legal remedy).
15. The right to the effective judicial remedy against the supervisory authority.
16. The right to the effective judicial remedy against the data manager or the data processor.

II. The rights of the person concerned in detail:

1. Transparent information, communication and supporting of exercising the rights of the person concerned .

- 1.1.** The data manager must provide all information about the data management of the personal data of the concerned person and all other information in a concise, transparent, intelligible and easy available way, formulated clearly and plainly for the person concerned, especially in case of any information addressed to children.

The information must be provided in writing or in an other way – also including the electronic way. If requested by the person concerned oral information can be given as well, providing that the identity of the person concerned was verified in an other way.

- 1.2.** The data manager must support exercising of the rights of the person concerned
- 1.3.** The data manager will inform the person concerned about the measures according to his application for exercising his rights without undue delay but definitely with one month after receiving the application. This term can be extended by two months with the conditions prescribed in the Regulation which the person concerned must be informed about.
- 1.4.** If the data manager does not take measures according to the application of the person concerned, then he will inform the person concerned without delay, but within one month after receiving the application at latest about the reasons of failing to take measures, as well as that the person concerned can lodge a complaint at any supervisory authority and he can make use of his right to judicial legal remedy.
- 1.5.** The data manager provides the information, as well as the information about the rights of the person concerned and the measures free of charge but in the cases specified in the Regulation a fee can be accounted.

The detailed rules are included in Article 12. of the Regulation.

2. The right to gather previous information – if the personal data are collected from the person concerned.

- 2.1.** The person concerned is entitled to receive information about the facts and information in connection with the data management prior to the beginning of the data management.
Within the scope of this the person concerned must be informed about the following:
 - a)** the identity and the availability of the data manager,
 - b)** the availability of the data protection officer (if any),
 - c)** the aim of the intended management of the personal data, as well as the legal title of the data management.
 - d)** in case of data management based on validation of legitimate interest, about the legitimate interest of the data manager or a third person.
 - e)** the addressees of the personal data – for whom the personal data are provided –, and the categories of the addressees, if any,
 - f)** in a particular case about the fact, that the data manager intends to transmit the personal data into a third country or for an international organisation.
- 2.2.** In the interest of the fair and transparent data management the data manager must inform the concerned person about the following additional directions:
 - a)** the period of time of personal data storage or if it is not possible, then about the aspects of specifying this period of time;
 - b)** he right of the person concerned that he can apply to the data manager for the access to the data concerning him, for their correction, cancelling or management restriction and he can protest against the management of such personal data, as well as about the right of data portability by the concerned person;
 - c)** in the case of the data management on the basis of the consent of the person concerned about that, that he has the right to withdraw the consent at any time,

that does not concern the legality of the data management performed prior to the withdrawal on the basis of the consent;

- d) **the right of submitting a complaint addressed to the supervisory authority;**
 - e) about that, if the personal data supply is based on a law provision or a contractual obligation or it is a precondition of concluding the contract, as well as if the concerned person is liable to provide personal data, furthermore what possible consequences can have failing to provide the data;
 - f) the fact of the automated decision making also including the profiling, as well as the logics used in these cases at least and the information, what is the significance of such a data management and what are the consequences for the person concerned.
- 2.3.** If the data manager intends to perform a further data management of the personal data for the aim differing from the aim of their collection, then he must inform the person concerned prior to further data management about this differing aim and all relevant additional information.

The detailed rules of the right to previous information are included in the article 13. of the Regulation.

3. Information of the person concerned and the information to be made available, if the personal data are obtained not from him.

- 3.1.** If the personal data are obtained not from the person concerned, then the data manager must inform the person concerned about the facts and information included in the above section 2., in addition about the categories of the personal data of the person concerned, as well as about the source of the personal data and in a particular case about that if the data originate from publicly available sources, within one month after obtaining the personal data at latest; if the personal data are used for keeping of contacts with the person concerned, then at the establishing of the contact with the person concerned for the first time at least; or if probably the data will be given to an other addressee too, then at the disclosure of the personal data for the first time at latest
- 3.2.** For the further rules the statements written in the above section 2. (The right to gather previous information) are normative.

The detailed rules of this information are contained in article 14. of the Regulation.

4. The right of the concerned person to access.

- 4.1.** The person concerned is entitled to receive feedback from the data manager if managing of his personal data is in progress and if such a data management is in progress, then he is entitled to get access to the personal data and the connected information written in the above sections 2. and 3. (article 15. of the Regulation).
- 4.2.** If the personal data are transmitted into third countries or for an international organisation, then the person concerned is entitled to obtain information about the warranties according to article 46. of the Regulation concerning the transmission.
- 4.3.** The data manager must make available the copy of the personal data constituting the subject of the data management. For further copies requested by the person

concerned a fee of reasonable amount based on the administration costs can be charged by the data manager.

The detailed rules of the person concerned to access are included in section 15. of the Regulation.

5. The right to correction.

- 5.1.** The person concerned is entitled that at his request the inaccurate personal data concerning him are corrected by the data manager without unjustified delay.
- 5.2.** Considering the aim of data management the person concerned is entitled to ask for completion – among others by a complementary declaration – of the insufficient personal data.

These rules are included in section 16. of the Regulation.

6. The right to cancel (“the right to forget”).

- 6.1.** The person concerned is entitled that at his request the personal data concerning him are cancelled by the data manager without unjustified delay and the data manager is obliged to cancel the personal data of the person concerned without unjustified delay when
 - a)** the personal data are no longer needed for the aim for which they have been collected or managed in another way;
 - b)** the consent of the person concerned creating the basis of data management is withdrawn by him and there is no other legal basis for data management;
 - c)** the person concerned protests against the data management and there is no legal reason taking priority for data management;
 - d)** the personal data have been managed in an illicit manner;
 - e)** the personal data must be cancelled to fulfil the legal obligations prescribed in the law of the Union or the member state to be applied for the data manager;
 - f)** collecting of personal data takes places in connection with the offering of services, offered directly for children, connected with the information society.
- 6.2.** The right to cancel can not be made valid if the data management is required for the following:
 - a)** making use of the right to freedom of speech and to gather information;
 - b)** fulfilment of obligations according to the law of the Union or a member state to be applied for the data manager as well as to perform duties in the public interest or within the scope of exercising of the license of executive power assigned to the data manager;
 - c)** on the basis of public interest concerning the public health;
 - d)** for the aim of archiving in public interest, scientific and historical research or statistics, if this data management would be made impossible or seriously endangered by the right to cancel; or
 - e)** presentation, validation and protection of legal claims, respectively.

The detailed rules concerning the right to cancel are included in section 17. of the Regulation.

7. The right to restrict the data management.

- 7.1.** In case of restriction of data management such personal data can be managed, with the exception of storage, only with the consent of the person concerned or to present, validate or protect the legal demands or in the interest of the protection of an other natural person or legal entity or in the important interest of the Union or of any member state.
- 7.2.** The person concerned is entitled that at his request data management is restricted by the data manager if any of the following cases is realized:
- a)** the accuracy of the personal data is disputed by the person concerned, in this case the restriction concerns the period of time, that makes it possible for the data manager to check the accuracy of the personal data;
 - b)** the data management is illicit and cancelling of the data is opposed by the person concerned and instead of this he asks the restriction of their utilization;
 - c)** the data manager does not need the personal data for data management any longer, but they are demanded by the person concerned for pretending, validation and protection of the legal claims; or
 - d)** the person concerned protested against the data management; in this case the restriction concerns the period of time, until it is stated that the rightful reasons of the data manager take priority against the rightful reasons of the person concerned.
- 7.3.** The person concerned must be informed previously about releasing the data management restriction.

The related rules are included in section 18. of the Regulation.

8. Notification obligation connected with the correction or cancelling of personal data and restriction of the data management, respectively.

All addressees are informed by the data manager about all correction, cancellation or restriction of data management whom the personal data have been told to, with the exception if it proves impossible or it needs disproportionately big efforts. The persons concerned will be informed at his request about these addressees by the data manager.

These rules are included in section 19. of the Regulation.

9. The right to data portability.

- 9.1** The person concerned is entitled with the conditions included in the Regulation to receive the personal data concerning him, provided him for a data manager, in a format used in a wide range and legible by means of a machine, furthermore he is entitled to transmit these data to an other data manager without being hindered in it by the data manager to whom the personal data have been made available by him, if
- a)** the data management is based on a consent or an agreement; and
 - b)** the data management is performed in an automated way.
- 9.2.** The person concerned may also ask for direct transmission of the personal data between the data managers.

- 9.3.** The right to make use of the right to data portability can not violate the article 17. of the Regulation (The right to cancel (“The right to forget”). The right for data portability is not to be applied in the case, if the data management is of public interest or it is required for completion of a task within the scope of exercising of the licences of executive power assigned to the data manager. The rights and freedom of others can not be affected by this right.

The detailed rules are included in section 20. of the Regulation.

10. The right to protest.

- 10.1.** The person concerned is entitled to protest for any reason in connection with his own position against the management of his personal data on the basis of public interest, completion of a public duty (e) (1) article 6.) or a rightful interest (f) article (6)), also including the profiling based on the mentioned disposals. In this case the data manager may not continue to manage the personal data, with the exception if the data manager verifies that the data management is justified by such forcing rightful reasons which take priority against the interests, the rights and the freedom of the person concerned or which are connected with the presentation, validation or protection of legal demands.
- 10.2.** If the management of the personal data is performed in the interest of direct business acquiring then the person concerned is entitled to protest at any time against the management of the personal data concerning him for this aim also including profiling if it is connected directly with the business acquiring. If the person concerned protests against the management of his personal data in the interest of direct business acquiring, then the personal data can no longer be managed for this aim.
- 10.3.** The attention of the person concerned must be called expressly to these rights in the course of contact establishing at latest and the information must be visualized unambiguously and separated from any other information.
- 10.4.** The person concerned can make use of his right to protest with automated means based on technical specifications too.
- 10.5.** If the data management is performed for the aim of scientific or historical research or for the aim of statistics then the person concerned is entitled in connection with his own position to protest against the personal data concerning him, with the exception if the data management is required in the interest of performing of a task of public interest.

The related rules are included in article of this Regulation.

11. Automated decision making in individual matters including profiling.

- 11.1.** The person concerned is entitled that the effect of such a decision, based exclusively on automated data management – also including profiling – does not cover him that would have a legal affect on him or he would be concerned to a similar significant extent.

- 11.2.** This entitlement is not to be used in the cases, if the decision
- a)** is necessary in the interest of concluding or fulfilling the contract between the person concerned and the data manager;
 - b)** is made due to the possibility of the law of the Union or a member state to be applied for the data manager, that also specifies the appropriate measures serving the protection of freedom as well as of the rights of the person concerned; or
 - c)** is based on the expressed consent of the person concerned.
- 11.3.** In the cases mentioned in the above points a) and c) the data manager is obliged to take appropriate measures in the interest of the protection of the rights, freedom and the rightful interests of the person concerned including the right of the person concerned at least to ask for human intervention by the data manager, to express his standpoint and to lodge a complaint against the decision.

The further rules are included in section 22. of the Regulation.

12. Restrictions.

The law of the Union or of a member state to be applied for the data manager or data processor can restrict the effect of the rights and obligations by legislation measures (articles 12 to 22., article 34, article 5. of the Regulation), if the restriction has respect for the significant content of the fundamental rights and freedom.

The conditions of this restriction are included in section 23. of the Regulation.

13. Information of the person concerned about the data protection incident.

- 13.1.** If the data protection incident is associated with a probable high risk in respect to the rights and freedom of the natural persons, then the data manager must inform the person concerned without unjustified delay about the data protection incident. In this information the character of the data protection incident and at least the following must be made known:
- a)** the name and the availability of the data protection officer or of the other contact person providing further information;
 - c)** the probable consequences arising from the data protection incident must be made known.
 - d)** the measures taken or intended by the data manager to remedy the data protection incident including in certain cases the measures to mitigate of the possible disadvantageous consequences arising from the data protection incident.
- 13.2.** The person concerned should not be informed if any of the following conditions is fulfilled:
- a)** the data manager has taken appropriate technical and organizational measures and these measures have been realized in respect to the data concerned by the data protection incident, especially those measures – like the application of classification –, that make the data uninterpretable for the persons that are not authorized for the access to the personal data;
 - b)** the data manager has taken measures after the data protection incident which ensure that the high risk for the rights and the freedom of the person concerned will probably not be realized in the future.

- c) disproportionate efforts would be made necessary by the information. In such cases the persons concerned must be informed by publicly released information or a similar measure must be taken that ensures a similar effective information of the persons concerned.

The further rules are included in article 34. of the Regulation.

14. The right to make a complaint at the supervisory authority (the right to the official legal remedy).

The person concerned is entitled to lodge a complaint at a supervisory authority – especially in the member state according to his usual residence, workplace or the place of the assumed infringement of lawful rights –, when in his opinion the management of the personal data concerning him violates the Regulation. The supervisory authority at which the complaint was lodged is liable to inform the client about the proceedings developments and its result concerning the complaint, also including that the client is entitled to make use of judicial remedy.

These rules are included in section 77. of the Regulation.

15. The right to the effective judicial remedy against the supervisory authority.

- 15.1** Without violation of other administrative remedy or the remedy not appertaining to the court way every natural person and legal entity is entitled to an effective judicial remedy against the legally binding decision of the supervisory authority concerning him.
- 15.2.** Without violation of other administrative remedy or the remedy not appertaining to the court way every person concerned is entitled to an effective judicial remedy, if the competent authority does not deal with the complaint or it does not inform the person concerned about the proceedings developments and its result within three months.
- 15.3.** The proceedings against the supervisory authority should be commenced at the court of the member state according to the seat of the supervisory authority.
- 15.4.** If the proceedings are commenced against a decision of the supervisory authority in connection of which, within the scope the uniformity mechanism, a statement was published or a decision was taken previously by the Corporation, then the supervisory authority is liable to send this statement or decision to the court.

These rules are included in article 78.

16. The right to the effective judicial remedy against the data manager or the data processor.

- 16.1.** Without violation of the available administrative remedies and the remedies not appertaining to the court way – among these of the right to lodge a complaint at the supervisory authority – is every person concerned entitled to an effective judicial remedy, if in his opinion his rights according to this Regulation have been violated by the inadequate management of his personal data.

16.2. The proceedings against the data manager or the data processor should be commenced at the court of the member state according to the place of activity of the data manager or the data processor. These proceedings can also be commenced at the court of the member state according to the usual residence of the person concerned, except if the data manager or the data processor is an organ of executive power of a member state proceeding in its authority of executive power.

These rules are included in section 79. of the Regulation.

Tatabánya, May 25th 2018

István Hoffart
manager
signed