

## PRIVACY NOTICE

**Zerlux Hungary Kft.** (hereinafter: Company) provides the following information on data protection in order to ensure the lawfulness of its internal processing activities and to ensure the rights of and provide information to the data subjects.

Controller:	Zerlux Hungary Kft
Company registration number of the Controller:	13-09-186762
Registered office of the Controller:	2100 Gödöllő, Pattantyús Ábrahám krt. 10.
Electronic address of the Controller:	office@zerluxhungary.com

We wish to inform you that our Company processes personal data in compliance with the applicable laws and regulations, i.e., primarily Act CXII of 2011 on the Right of Informational Self-Determination and the Freedom of Information (hereinafter: 'Infotv') and the Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter: GDPR).

Our Company processes personal data confidentially and takes all IT and other technical and organisational measures that support secure processing and relates to the storage and processing of data in order to preserve them.

Our Company fulfils its obligation to supply information pursuant to the GDPR with this notice.

### What is the purpose of processing?

In the current accelerated information society, our Company maintains contact with its partners and customers primarily electronically.

You can contact us via electronic mail, sent to our central e-mail address [office@zerluxhungary.com](mailto:office@zerluxhungary.com), or call us on +36 (20) 339 8011.

During any electronic communication conducted with you in relation to any matter your personal data will be processed as described in this notice.

The purpose of processing your personal data is to respond to your requests and enquiries after you have contacted our Company. Contact may be established in relation to the performance a concluded contract or prior to it.

### What personal data do we process?

Name of the organisation and contact person, e-mail address, phone number, company registration number tax number, bank account number any other information that is deemed important or necessary by you or is required by the law in the case initiated by you.

### What is the legal ground of processing?

Pursuant to Article 6(1)b) of the Regulation, processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

Our Company considers that communication with partners qualifies as prior processing in relation to a contract (agreement) to be concluded later or processing related an existing contract.

### Who are involved in processing?

The personal data supplied by you may be accessed only be employees of our Company who have the right to maintain contact, make proposals or decisions in relation to the performance of your order or the contract with you or the administration required accordingly.

### Which processors take part in processing?

- **Invitech Megoldások Zrt.** (2040 Budaörs, Edison utca 4.) The messages sent to our Company's e-mail address [office@zerluxhungary.com](mailto:office@zerluxhungary.com) are stored on the servers of the e-mail provider.
- **Telenor Magyarország Zrt.** (2045 Törökbálint, Pannon út 1.) The calls made on the telephone number +36 (20) 339-8011 used by our Company are managed on the servers of the telephone provider company.
- **H-Adó Consulting Kft.** (5000 Szolnok, Kisgyep u. 7.) Our Company employs an external provider for accounting activities that are performed in compliance with the effective financial accounting and tax regulations.

Our processors may process your personal data only in compliance with the provisions of the effective laws and regulations and for the purposes defined by us and in the contract, according to our instructions. They do not have a right to make independent decisions on processing unless it is specified by any effective legal regulation.

Our processor undertook a confidentiality obligation and contractual guarantees to preserve the personal data obtained while performing their tasks.

### **Do we transfer your personal data to any third country or an international organisation?**

Our Company does not transfer your personal data indicated above to any third country or to an international organisation.

### **How long do we process your personal data?**

If any agreement or contract is established between our Company and you, your personal data obtained during communication will be managed in relation to the particular contract for no longer than the statutory limitation period.

The general statutory limitation period is 1 year unless a longer preservation period is specified in any effective legal regulation following the performance of the order or contract.

If no contract or agreement is established between our Company and you following processing prior to the contract, then the data will be deleted after the closing of the communication.

### **Is there any automated decision-making and profiling during the process?**

None takes place during processing.

### **What rights have you got in relation to processing?**

- **You have a right to information!**

You have a right to receiving information on processing, which our Company gives you in this notice case.

- **You have a right to processing under consent!**

If the legal ground of any processing is your consent pursuant to Article 6(1)a) of the Regulation, you may withdraw your consent granted earlier to processing. However, it is important to know that the withdrawal of consent relates only to data, the processing of which has no other legal ground. If the processing of the respective personal data has no other legal ground, then following the withdrawal of your consent your personal data will be erased finally and irrecoverably. The withdrawal of consent does not have any impact on the lawfulness of processing made under consent prior to the withdrawal.

- **You have right to access!**

Upon your request the Company will inform you whether or not your personal data are being processed and if so, will specify the personal data processed and the method of processing.

- **You have a right to the rectification of data!**

You have a right to request at any time the rectification of any of your inaccurate personal data without any reasoning or delay. Taking into account the purpose of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Please report any change in your personal data to our Company, as soon as possible, thus facilitating lawful processing and the enforcement of your rights.

- **You have a right to the erasure of data!**

You have a right to request our Company to erase your personal data without any unjustifiable delay if any of the following criteria is fulfilled:

- The personal data are no longer needed for the purpose they were collected for;
- You object to the processing and there is no prevalent legitimate reason for the processing of the data;
- Your personal data were processed unlawfully.
- The personal data must be erased for compliance with a legal obligation in EU or Member State law applicable to our Company.

Our Company will not fulfil your erasure request if any of the following reasons required for further processing prevails:

- the fulfilment of an obligation relating to the processing of personal data based on the legislation of the EU or a Member State, applicable to our Company,
- for the presentation, enforcement or defence of legal claims.

All data processed by us are erased finally and irrecoverably.

- **You have a right to restrict processing!**

You have the right to request the Company to restrict processing in the following cases:

- You contest the correctness of the personal data, in which cases the restriction shall only apply to the time period necessary for us to verify the accuracy of the personal data;
- processing is unlawful and you do not consent to the deletion of data, but request the limitation of their use;
- our Company no longer needs the personal data for processing but you request the data for the submission, enforcement or protection of legal claims.
- You have placed an objection to the processing of personal data; in such cases the limitation shall only apply to the period necessary to determine whether the Company's legitimate reasons would precede the legitimate reasons of the data subject.

If processing is restricted, such personal data may only be processed, not including storage, if:

- with your consent,
- for the establishment, exercise or defence of legal claims.
- for defending the rights of another natural person or legal person, or
- in the public interest of the European Union or a Member State.

- **You have right to object**

If your personal data are processed on the basis of a legitimate interest of our Company or upon consent (e.g. earlier subscription for a newsletter) You are entitled, at any time, to object to the processing of your personal data for reasons relating to your own situation.

In such cases our Company shall abandon their data processing activities unless we can prove that these activities are made necessary by legitimate obligations which take precedence over your interests, rights and freedoms, or are necessary for the submission, enforcement or protection of legal claims.

- **You have a right to data portability!**

You have a right to receive the personal data concerning you, which you have provided to the Company, in a structured, commonly used and machine-readable format and you also have the right to request the transfer of such data to another controller. You therefore may request the Company to transfer your personal data directly to another controller.

- **What is the procedure to enforce your rights?**

You may exercise your rights indicated above via e-mail, sent to [office@zerluxhungary.com](mailto:office@zerluxhungary.com), letter posted to the registered office of our Company (2100 Gödöllő, Pattantyús Ábrahám kft. 10.), or in person at the registered office of our Company. Our Company will begin the assessment and performance of your request without any unjustifiable delay after its receipt. You will be informed of the measures taken on the basis of your request within 30 days from its receipt. If we cannot fulfil your request, then you will be informed of the reasons of the refusal within 30 days and your right to legal remedy.

- **What are your legal remedy rights relating to processing?**

If you think that the processing of your personal data is contrary to the provisions of the GDPR regulation, you may submit a complaint to our Company. If we cannot handle your complaint adequately and relevantly, you may seek legal remedy in court.

In order to enforce your right to seek legal remedy in court, you may turn to a court against your company when, in your opinion, our Company or any processor employed by us or acting on our order processes your personal data infringing the provisions of the law on the processing of personal data or of any binding legal act of the European Union.

The court shall hear such cases in priority proceedings. The action shall be heard by the competent general court. Based on your choice, the litigation may also be instituted before the tribunal having competence at the place of your permanent or temporary residence or with regard to the registered office of our Company (Budapest Court of Registration attached to the Company Court).

If you believe that the processing of your personal data infringes the Regulation, you have the right to submit a complaint to a supervisory authority without prejudice to any other administrative or judicial remedy. The authority must investigate your complaint and inform you of the outcome of its investigation. You may submit a complaint to any authority of any EU Member State, including especially the Member State of your habitual residence, workplace or the alleged infringement.

The contact information of the Hungarian data protection authority is provided below.

Anyone is entitled to request an investigation at the National Authority for Data Protection and Freedom of Information (NAIH) against the Company on the grounds of infringement of the law in connection with the processing of personal data or in the event of such immediate threat of the above, or of the restriction of the enforcement of your rights related to processing by the Company or the rejection of your request to enforce such rights by the Company.

The request must be submitted in any of the following ways:

National Authority for Data Protection and Freedom of Information (NAIH)

Postal address: 1530 Budapest, Pf.: 5.  
Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c  
Phone: +36 (1) 391-1400  
Fax: +36 (1) 391-1410  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
URL: <http://naih.hu>