

Information about the Processing of Personal Data for the use of the webpage www.erbe.hu

Based on Articles 13 and 14 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 (hereinafter referred to as GDPR) the data controller provides hereunder the following information in connection with controlling of personal data:

	Data controller	Data protection officer
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Data processing regulations
<p>The Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 in force 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 referred to as GDPR) is available at the link: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC</p>
<p>The Act CXII of 2011 on information self-determination and freedom of information in force (hereinafter referred to as „Act on information” is available at the link: http://njt.hu/cgi_bin/njt_doc.cgi?docid=139257.338504</p>

Pursuant to the GDPR „personal data” means any information relating to an identified or identifiable natural person (**data subject**); An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Cookie means: a file of a character set which, upon visit of the webpage, is created in the computer. Every time the user goes back to the same website, the browser retrieves and sends this file to the website’s server. The cookies may store the user’s settings and other information concerning the webpage. The browser may be set to reject all cookies or to show the user if a cookie is sent by the system. However it is important to note that without cookies certain functions may not be performed properly at the webpage.

- **The data processor shall only use cookies during the functioning of the website that are absolutely necessary.** The cookies are indispensable for the proper functioning of the website. Such cookies do not collect personal data from the data subject which may be used, for example, for marketing purposes. Information is collected by such cookies about the correct functioning of the website and about any operating failures. The functional cookies ensure the proper appearance of the webpage and memorize the settings selected by the data subject previously (e.g.: country/language, image/colour, font sizes, etc.).
- **The webpage contains cookies of a third party, however it does not contain targeting cookies.**

- Cookies created by a third party: It facilitates sharing of the contents of the website of an other data controller (e.g. social site, Google Analytics, Adobe Marketing Cloud, etc.) and sends information to the data controller of the third party which are used later for targeted advertisements on other websites.
- Targeting cookies: ensure that personal ads appear on the website which correspond to the sphere of interest of the data subject (e.g.: based on previous searches, selected menu items, etc.). On the website operated by the data controller ads can be found which are associated with the services provided by the data controller.

THE PERSONAL DATA

Purpose of the personal data control:	Data control of the users concerning online appearance. Control of the device data and personal data disclosed by the data subject for logging (by server log) and safety purposes and for providing website services, monitoring and protection of its functionality.
The time limits for storing the data:	1 year of the date of entry.
The source from where the personal data originate:	Directly from the data subject.

The data of the used devices	Why is it necessary?
IP address	It is indispensable due to safety reasons for using the cookies.
Type and language of the browser or the operating system	Data depending on the computer settings of the data subject.
The starting and the last date of visiting the webpage	It is indispensable to use the cookies due to safety reasons.

Legal ground for the processing:	Legitimate interest of the data controller
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NAME OF THE RECIPIENT(S) IF ANY

Name of the recipient(s)	Purpose of disclosure
MVMI Zrt. 7030 Paks, Vasút u.1.	Data processor providing IT services

WHO MAY HAVE ACCESS TO THE DATA SUBJECT'S PERSONAL DATA?

As a main rule, the data controller's employees may have access to the personal data of the data subject in order to perform their tasks (for example the data controller's employees responsible for informatics services and communication appearances for organisational purposes and the data processors of the **recipients**).

The data controller is allowed to disclose the personal data of the data subject to another organisation of the state only in exceptional circumstances. Such as, for example, if court proceedings have been launched concerning a legal dispute between the data subject and the data controller and the documents including the personal data of the data subject shall be forwarded to the proceeding court. Therefore, the Police Department shall contact the data controller by requesting, for investigation purposes, the documents including the personal data of the data subject. In addition, for example, a lawyer legally representing the data controller may also have access to the personal data, if a legal dispute has been arisen between the data subject and the data controller.

DATA PROTECTION MEASURES

The data controller shall store the personal data in the data controller's registered and branch office. The data controller uses the services of the **recipient's** data processor in the course of which the data are stored at the data processor's registered office or branch office.

The data controller arranges, by proper data protection measures, for the protection of the personal data of the data subject against unlawful access or unlawful change thereof. Therefore, for example, access to the personal data stored on the servers will be logged, based on which it can always be checked who, when and which personal data were accessed to. The data controller shall organise that the personal data are not disclosed to an undefined number of persons.

The Data Controller's website includes also links which are not operated by the data controller. The data controller shall not be responsible for the protection of the contents of the links of the websites operated by other data controllers.

Neither the data controller nor the data processor is allowed to TRANSFER the personal data included in this Information sheet to a third country or to an international organisation.

Neither the data controller nor the data processor APPLIES automated decision making or profiling concerning the personal data included in this Information sheet.

Right of access by the data subject

Pursuant to Article 15 of the GDPR the data subject may apply for the access of the personal data relating to him/her as follows:

- (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 the following information*:
 - a) the purposes of the processing;
 - b) the categories of the personal data concerned;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) 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) 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. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

Pursuant to Article 16 of the GDPR the data subject shall have the right to obtain from the controller the rectification of inaccurate personal data.

Upon the data subject's request concerned, the controller shall rectify without undue delay the inaccurate personal data concerning him or her. 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.

Pursuant to Article 17 of the GDPR the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her as follows:

- (1) The data subject shall have the right to *request* from the controller *the erasure* of personal data concerning him or her 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 of personal data obtained where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority or in the legitimate interest of the data controller (third party) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes;
 - 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 (*the laws of Hungary*) to which the controller is subject;
 - f) the personal data have been collected in relation to the offer of information society services.
- (2) Where the controller has made the personal data public and is obliged pursuant to paragraph (1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, *to inform controllers which are processing the personal data* that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

(3) The right of *erasure of the data subject* may only be restricted in the following exceptional circumstances stipulated in the GDPR that is based on the above grounds the personal data may lawfully be stored if:

- a) for exercising the right of freedom of expression and information, or
- b) for compliance with a legal obligation, or
- c) for reasons of public interest, or
- d) for the exercise of official authority vested in the controller, or;
- e) for reasons of public interest in the area of public health;
- f) for archiving purposes in the public interest, or
- g) for scientific or historical research purposes or statistical purposes, or
- h) for the establishment, exercise or defence of legal claims.

Pursuant to Article 18 of the GDPR the data subject shall have the right to obtain from the controller the restriction of processing of personal data concerning him or he

- (1) 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 of personal data obtained where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority or in the legitimate interest of the data controller (third party); pending the verification whether the legitimate grounds of the controller override those of the data subject.
- (2) Where processing has been restricted as described above, 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.
- (3) A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller *before* the restriction of processing is lifted.

Pursuant to Article 21 of the GDPR the data subject shall have the right to object to processing of personal data concerning him or her as follows:

- (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 for the performance of a task carried out in the public interest or in the exercise of official authority or in the legitimate interest of the data controller (third party) 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 for the establishment, exercise or defence of legal claims.
- (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.

- (3) At the latest at the time of the first communication with the data subject, the right of objection to processing of data shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
- (4) In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.
- (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, 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.

Pursuant to Article 20 of the GDPR the data subject shall have the right to the portability of data concerning him or her as follows:

- (1) 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 legal basis of the processing is the data subject's consent or the performance of the contract concluded with the data subject and;
 - b) the processing is carried out by automated means.
- (2) In exercising his or her right to data portability the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
- (3) The exercise of the right to data portability shall not be without prejudice to the right to erasure of the personal data. The right to the portability of data 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.
- (4) The right to data portability shall not adversely affect the rights and freedoms of others.

Pursuant to Article 7(3) of the GDPR the data subject shall have the right to withdraw his or her consent at any time as follows:

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. It shall be as simple process to withdraw as to give consent.

Every data subject should have the right to lodge a complaint with a supervisory authority

In case of unlawful processing the data subject may lodge a complaint with the data controller. Judgement of the dispute shall be in the jurisdiction of the tribunal. The complaint should be lodged, at the data subject's discretion, with the tribunal of the data subject's domicile (the list and access data of the tribunals may be found through the following link: <http://birosag.hu/torvenyszekek> .

Without prejudice to any other administrative or judicial remedies, 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 the regulations of the GDPR.

National Authority for Data Protection and Freedom of Information

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