

Information on data management

1. Name of data controller

Name: Ferenc Varga
Address: 1152 Budapest, Szentmihályi street 23.
Tax number: 61202191-2-42
E-mail: info@femgozoles.eu
Phone: +36-20/945-7938
Website: www.femgozoles.eu
hereinafter referred to as the Data Controller.

If you have any questions or comments about this notice, before using the Controller's website or providing any information, please contact the website or the contact details provided in this notice.

2. Rules on data processing

The following legislation applies to the processing carried out by the Data Controller:

- 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 Regulation (EC) No 95/46/EC.
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (the "Data Protection Act").

3. Scope and acceptance of this privacy notice

From time to time this notice may change due to various updates. The Data Controller reserves the right to amend this Privacy Notice unilaterally, without prior general notice, with effect from the date of the amendment. In this respect, it is recommended that you regularly visit the Controller's website in order to monitor the acceptability of changes. Last update of this notice: 18.03.2020.

(In case of non-availability of the current version, the Data Controller will send you a copy of the current version of the Prospectus by e-mail upon request.) By providing this information, you declare that you have read and expressly accept the version of this notice in force at the time of providing this information.

4. Data collected from customers

In general, you can use the website of the Data Controller without providing any information, however, if you wish to register on the website or use any of its services, the Data Controller will ask for information about you.

The information you provide may include the following data:

- Your name and contact details, including mailing and e-mail addresses, fax and telephone numbers, other internet contact details;
- the name of your company, your position within the company;
- your or your company's bank account number, billing address.

Some of the information collected by the Data Controller is personal data within the meaning of the Data Protection Act. This means that the data can be linked to you or used to identify you. This includes, in particular, your name, your identifying mark and knowledge of one or more of your physical, physiological, mental, economic, cultural or social identities - and the inference that can be drawn about you from the data. The Personal Data will retain this quality during processing for as long as its relationship with you can be re-established. The link with you can be re-established if the controller has the technical conditions necessary for such re-establishment.

In this notice, the terms 'Personal Data' and 'data relating to you' are used interchangeably.

Data about you is collected by the Controller in various ways, including (a) when you provide it to the Controller and its partners through websites; or (b) when you contact the Controller and provide information to the Controller in person, by telephone, in writing, via the Internet, by using its services or otherwise.

The Controller shall retain information about you only for as long as it is strictly necessary for the purposes for which it is processed, for the purposes of

The data will be kept only for as long as necessary to achieve the purpose for which it was collected or for as long as permitted by any contract or law.

5. Scope of personal data processed purpose, duration and legal basis of the processing

5.1 The Data Controller processes data on the basis of the voluntary consent of the data subjects or on the basis of a legal authorisation. In the case of voluntary consent, the data subject may at any time request information about the scope of the data processed and the way in which it is used, and may withdraw his or her consent, except in specific cases where the processing is continued pursuant to a legal obligation (in such cases, the Controller shall provide the data subject with information about the further processing of the data).

5.2. The data providers are obliged to provide all data accurately and to the best of their knowledge.

5.3. Where the data subject does not provide his or her own personal data, it is the data subject's responsibility to obtain the data subject's consent.

5.4. If the Data Controller transfers the data to processors or other third parties, the Data Controller shall keep a record of these. The record of the data transfer shall include the recipient of the data transfer, the method and time of the transfer and the scope of the data transferred.

5.5. Data processing related to certain activities of the Data Controller:

a) Contact online by entering name / phone number / e-mail address

Legal basis for processing: data subject's consent.

Data processed: name, e-mail address, telephone number

Purpose of data processing: contacting the customer, explaining the purpose of the contact.

Legal basis for the transfer of data: use of data for internal, contractual purposes only.

Data processor: Data Controller as defined in point 1;

Deadline for deletion of data: immediate deletion of data after technical consultation, in case of failure to conclude a contract.

Possible consequences of non-disclosure: inability to conclude a contract.

b) Offline enquiry

Legal basis for processing: data subject's consent.

Data processed: name, e-mail address, telephone number

Purpose of the processing: to determine the suitability of the applicant for a personal consultation; the telephone number, appointment and data are required for the purposes of data reconciliation.

Data transfer: to an internal system for the purpose of operating a customer contact system.

Legal basis for transfer: to fulfil a contractual obligation.

Data Processor: the Data Controller as defined in point 1;

Deadline for deletion of data: immediate in the event of a failed contract.

Possible consequences of non-disclosure: impossibility of personal consultation.

6. Data management

The Controller processes data about you for the following purposes: (a) to register you on the Controller's website or to provide the services offered by the website (including to search for or request any information about the Controller and its services);

(b) to evaluate and analyse the Controller's market, customers and services (including seeking your views on the Controller's services and conducting customer needs surveys); (c) to provide, monitor, revise or expand the sites and services offered by the Controller; (d) to perform contractual obligations with you (including the sale of the Controller's services to you); and (e) where you have provided information to the Controller for the purposes of employment with the Controller or with a company belonging to another business partner of the Controller, for the purposes of deciding whether to employ you; and (f) for the purposes of communicating with you in connection with the above.

There may be several legal bases for the processing of your data: (a) the Data Controller processes your data primarily with your consent; (b) the Personal Data provided in a contract with you are necessary for the performance of the contract, and therefore the Data Controller may also process your data on this legal basis; (c) the processing is necessary to comply with legal obligations to which the Data Controller is subject, such as the need to keep contracts until the end of the limitation period for possible tax authority investigations.

Data processed by the Data Controller will be erased at your request, subject to the conditions and exceptions set out in this notice. In the event of the conclusion of a contract, the Data Controller will keep your data for 7 years from the termination of the contract and will only delete them afterwards.

Data transmission: address: company registration number: tax number: for the purpose of issuing and storing invoices.

Legal basis for transmission: conclusion of a contract, fulfilment of the obligation to issue invoices.

Data processors:

Address: company registration number: tax number: for the purpose of issuing and storing invoices. storing invoicing data;

Deadline for deletion of data: 5 years after the data have been provided, except for the telephone number, which the Data Controller deletes within 3 months after the order has been fulfilled, and credit card data, which it deletes within 1 year after a successful transaction.

Possible consequences of failure to provide the information: until receipt of the product ordered: the impossibility of fulfilling the order; in the event of failure to provide a telephone number, the failure to deliver the physical product, if any, with a higher rate of failure, in which case the Data Controller reserves the right to attempt to redeliver the product at the expense of the person concerned; once the transaction has been completed, only the bank account data and the telephone number may be deleted (the former may be deleted only after a declaration by the data owner that the transaction has been duly completed and that he does not contest the transaction in any respect), the other data (name, e-mail address, address, delivery address) may not be deleted until the date indicated for legal reasons.

(e) where you have provided information to the Data Controller for the purposes of your employment with the Data Controller or with a company belonging to another business partner of the Data Controller, for the purposes of making a decision in this regard; and (f) for the purposes of communicating with you in connection with the above.

There may be several legal bases for the processing of your data: (a) the Data Controller processes your data primarily with your consent; (b) the Personal Data provided in a contract with you are necessary for the performance of the contract, and therefore the Data Controller may also process your data on this legal basis; (c) the processing is necessary to comply with legal obligations to which the Data Controller is subject, such as the need to keep contracts until the end of the limitation period for possible tax authority investigations.

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7. Access to data and data security measures

7.1 In order to ensure lawful processing, the Data Controller ensures that no unauthorised person has access to your data. In particular, reasonable physical, electronic and managerial procedures are in place to protect your Personal Data against unauthorised access, alteration, disclosure, erasure or destruction, accidental destruction or damage and inaccessibility due to changes in the technology used. In carrying out these activities, the Data Controller shall take particular care to prevent any unlawful or unauthorised action in relation to the processing of your Personal Data. The Data Controller shall keep the documents in a physically lockable place and in a lockable cabinet. The documents shall be accessible to authorised persons. Data stored online shall be password protected and accessible only to authorised persons. To ensure lawful processing, the Data Controller uses a firewall and anti-virus software to protect against external attacks.

7.2 The Data Controller will not disclose Personal Data about you to third parties without your consent, except: (a) where it is necessary for the performance of tasks to be carried out by the Data Controller's employees, associates, suppliers or commercial partners in connection with the purposes of the processing (including sales-related services, sales assistance, market research, services to be provided to customers, account management, the provision and monitoring of products and services to be provided to you, or for promotional purposes); (b) in case the disclosure of information about you to other companies, financial institutions or public authorities (as defined by law) is necessary or desirable for crime prevention or consumer protection purposes; (c) a lawyer representing the Data Controller will also have

access to your personal data in case any legal proceedings would be initiated in relation to the data you have provided; (d) if the Data Controller is required or permitted by law or is obliged to do so by a final court or administrative decision.

In the event that your Personal Data is shared with a carefully selected third party, or with a third party listed above, the Data Controller will in all cases comply with the requirements of data protection legislation, where necessary by contractual arrangements with the third party to ensure that the third party: (a) does not use your Personal Data for purposes other than those indicated or set out in these Guidelines; and; (b) takes appropriate security measures to protect your Personal Data against, in particular, unauthorised access, alteration, disclosure, disclosure, erasure or destruction, accidental destruction or damage, and inaccessibility resulting from changes in the technology used.

The Data Controller will take all necessary precautions to ensure that its employees, associates and contractors who have access to information about you are able to handle it in accordance with this Policy and their obligations under data protection law. You will ensure in the contracts you enter into with your employees, associates and contractors that they are bound by confidentiality obligations in relation to the information you provide to them.

7.3. The personal data you provide will be stored digitally by the Data Controller and kept securely at the company's headquarters or branch office or on the company's own computer equipment.

8. Data of visitors to the website of the Data Controller

8.1 The Data Controller does not record any data necessary for the identification of visitors when they visit the website operated by the Data Controller, as defined in point 1.

8.2 For the purposes of web analytics measurements, the html code of the website operated by the Data Controller as defined in point 1 may contain independent links from and to an external server. The measurement also includes tracking of conversions. The web analytics provider will not process any personal data, only browsing-related data that cannot be used to identify individuals. Currently, the web analytics services are provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, as part of the Google Analytics service.

8.3 The Data Controller runs so-called remarketing ads through the Facebook and Google AdWords advertising systems. These service providers may collect or receive data from the Controller's website and other internet sites through the use of cookies, web beacons and similar technologies. They use this data to provide measurement services or to target advertisements. Such targeted ads may appear on additional websites in the Facebook and Google partner network. Remarketing lists do not contain any personal data of the visitor and are not personally identifiable.

8.4 The user can delete the use of cookies from his/her own computer or prohibit their use in his/her browser. These options depend on the browser, but are typically available in the Settings / Privacy menu. For more information on Google and Facebook's privacy policies, please see the contact details below:

<http://www.google.com/privacy.html>

<https://www.facebook.com/about/privacy/>

9. Your rights regarding data processing

9.1 Right to information and access:

You may request that the Data Controller inform you whether it processes your personal data and, if so, provide you with access to the personal data it processes. You have the right to obtain access to information about the following personal data, where it relates to you: (a) the purposes of the processing; (b) the categories of your personal data; (c) the recipients or categories of recipients to whom or with whom the personal data have been or will be disclosed, including in particular recipients in third countries; (d) if the data have been collected by the Controller from parties other than you, any available information about their source; (e) in the case of transfers of personal data to third countries, the safeguards in place to ensure that the transfers are lawful; (f) the circumstances and effects of any data breach that may have occurred and the measures taken to address it.

You may at any time request information about the processing of your personal data in writing, by registered or certified mail sent to the address of the Data Controller as set out in point 1, or by e-mail sent to the e-mail address. A request for information sent by letter shall be considered authentic if the request sent clearly identifies you.

A request for information sent by e-mail shall be considered authentic only if it is sent from your registered e-mail address, but this does not preclude the Data Controller from identifying you in another way before providing the information. The request for information may cover the data processed by the Data Controller, the source of the data, the purposes, legal basis and duration of the processing, the names and addresses of any data processors, the activities related to the processing and, in the case of a transfer of personal data, who has received or is receiving your data and for what purposes.

The controller will comply with your request as soon as possible, but not later than 30 days, by sending a letter to the contact details you have provided.

9.2 You may request the correction or modification of your personal data processed by the Data Controller. Taking into account the purpose of the processing, you may request the completion of incomplete personal data. The request for rectification or amendment may be made in the same form (in writing or by e-mail) as the request for information set out in point 9.1 above. The controller will comply with your request within a maximum of 30 days and will notify you by letter to the contact details you have provided.

9.3 You may request the erasure of your personal data processed by the Data Controller. The erasure may be refused if the processing is necessary (i) for the exercise of the right to freedom of expression and information, or (ii) if the processing of personal data is authorised by law; and (iii) for the establishment, exercise or defence of legal claims. In any case, the Data Controller shall inform you of any refusal to comply with a request for erasure, indicating the reasons for the refusal.

Once the request for erasure of personal data has been complied with, the previous (erased) data can no longer be restored. The request for erasure may be made in the same form (in writing or by e-mail) as the request for information set out in point 9.1 above. The Data Controller will comply with your request as soon as possible, but within 30 days at the latest, and will notify you thereof by sending a letter to the contact details you have provided.

9.4 In connection with direct sales, you may at any time, without restriction and without giving any reason, request free of charge that the Data Controller delete your data from the relevant database by contacting us using the contact details provided in section 1. In addition, if you receive direct marketing material from the Data Controller by e-mail or SMS, you will be reminded, both in the e-mail and in the SMS, that you have the possibility to request, at any time, without restriction and without giving any reason, to be deleted from the database relating

to direct marketing, free of charge. If you so request, your Personal Data will be deleted by the Data Controller from the database referred to in this point without delay.

9.5. You may request the restriction of the processing of your personal data by the Controller if one of the following conditions is met: (i) you contest the accuracy of the personal data processed, in which case the restriction shall be for a period of time that allows the Controller to verify the accuracy of the personal data; (ii) if the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use; (iii) the Controller no longer needs your personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims; (iv) you have submitted a request for the restriction of the processing in accordance with Article 21. (iv) you have objected to the processing pursuant to Article 21(1) of the GDPR, in which case the restriction shall apply for the period necessary to determine whether the controller's legitimate grounds override your legitimate grounds.

The controller will always flag the personal data it processes if you contest its accuracy or correctness, but the incorrectness or inaccuracy of the contested personal data cannot be clearly established. The User may also request that the Data Controllers restrict the processing of his or her Personal Data if the processing is unlawful but the User opposes the erasure of the processed Personal Data and instead requests the restriction of its use. The Controller will inform you of the lifting of the restriction of processing. The request for restriction may be made in the same form (in writing or by e-mail) as the request for information set out in point 9.1 above.

9.6 You may request the Controller to transfer the personal data provided by you and processed by automated means to you and/or to another controller in a structured, commonly used, machine-readable format. Requests for the transfer and transmission of data may be made in the same form (in writing or by e-mail) as a request for information as set out in point 9.1 above. The controller shall comply with your request as soon as possible, but not later than 30 days, and shall notify you thereof by sending a letter to the contact details you have provided.

9.7. You may object to the processing of your Personal Data (i) where the processing of the Personal Data is necessary solely for compliance with a legal obligation to which the Controller is subject or for the purposes of the legitimate interests pursued by the Controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of Personal Data, in particular where the data subject is a child; (ii) where the purpose of the processing is direct marketing, public opinion polling or scientific research; or (iii) where the processing is carried out for the performance of a task carried out in the public interest. The controller shall examine the lawfulness of your objection and, if the objection is justified, shall cease the processing and block the personal data processed and shall notify the objection and the action taken on it to all those to whom the personal data to which the objection relates have been disclosed.

10. Enforcement options

10.1 If you have any questions or comments about data processing, you can contact the Data Controller's staff at the e-mail address provided in section 1.

10.2. You may contact the National Authority for Data Protection and Freedom of Information directly with any complaints regarding data processing (address: 1125 Budapest, Szilágyi

Erzsébet fasor 22/c.; phone: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).

10.3. You can take your rights to court if your rights are infringed. The court has jurisdiction to hear the case. You can also bring the case before the court of your place of residence (for a list of courts and their contact details, please visit <http://birosag.hu/torvenyszekek>).

Budapest, 18.03.2020.