

## Privacy Policy

HORESZ L Hungary Limited Liability Company

### I.) **General information about the aim of the privacy policy**

HORESZ L Hungary Limited Liability Company ((1183 Budapest, Csévéző utca 7.)) (henceforth: HORESZ L LLC or **Data Controller**), as data controller, regards itself bound by the content of the present privacy policy, and is responsible that all data management processes related to its services be in compliance with the present privacy policy and current law. With its privacy policy, HORESZ L LLC agrees to handle all personal data in accordance with current law, and takes all security, organizational, and technical measures to protect data.

The present privacy policy contains the data management principles of HORESZ L LLC. The policy is in accordance with current data protection law, most importantly:

- Regulation 2016/679 (April 27, 2016) of the European Parliament and Council (EU) regarding the protection of personal data of natural persons and the free flow of such data, and the overruling of regulation 95/46/EK (general data protection regulations, henceforth: **GDPR**)
- Act CXII of 2011, on Informational Self-determination and Freedom of Information (henceforth: Infotv)

The present privacy policy is permanently accessible on the HORESZ L LLC homepage, at [www.horesz-l.com](http://www.horesz-l.com). HORESZ L LLC preserves the right to unilaterally modify this policy. Any such modifications will be communicated in due time before the changes take effect to all concerned parties at their email address that we handle according to law, and on our website.

Should you have any questions related to our privacy policy, write to us at the contact information under the Contact option on the [www.horesz-l.com](http://www.horesz-l.com) website, or email us at [info@horesz-l.com](mailto:info@horesz-l.com) or contact us by phone.

### II.) **Data controller information:**

**Name of the company:** HORESZ L Hungary Limited Liability Company

**Headquarters:** 7 Csévéző utca, Budapest 1183

**Corporate registration number:** 01-09-394819

**Phone:** +36-30/185-90-97

**Email:** [info@horesz-l.com](mailto:info@horesz-l.com)

### III.) **Cooperating data processors assigned by the data controller:**

- Proactive Business Zrt.
- MiniCRM Zrt.
- HST Management Zrt.

### IV.) **Terms used in the policy**

*Personal data:* any information concerning an identified or identifiable natural person (“data subject”); a natural person is identifiable if the person directly or indirectly can be identified through some identification, for example name, number, location identification data, online identification or through one or more factors concerning the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person;

*Consent of the data subject:* the voluntary, concrete, well-informed and unequivocal declaration of the data subject’s will, which signals the data subject’s consent to the management of her/his personal data through an announcement or an act that clearly expresses confirmation;

*Objection:* a declaration of the data subject, in which s/he protests against the management of her/his personal data and demands the cancellation of data management and/or the deletion of the managed data

*Data controller:* the natural or legal person, organization with executive power, agency or any other organization that defines the aims and means of personal data management by itself or together with others; if the aims and means of data management are defined by EU or member state law, then the data controller or the specific criteria to assign the data controller can be defined by EU or member state law

*Data management:* any automated or non-automated operation or the sum of operations performed on personal data or files, such as collection, recording, filing, partitioning, storing, conversion or alteration, inquiry, introspection, usage, transmission of communication, dissemination or any other means of making accessible, synchronizing or linking, limiting, deletion, or destruction

*Data transfer:* making data accessible to a specified third person;

*Publication:* making data accessible to anybody;

*Deletion of data:* making data unrecognizable in such a way that restoration of data is no longer possible;

*Data processing*: the completion of technical tasks related to the data management operations, regardless of the method and means used to perform the operations, and of the location of the usage, as long as the technical task is performed on the data;

*Data processor*: the natural or legal person, organization with executive power, agency or any other organization that manages data on behalf of the data controller;

*Third party*: the natural or legal person, organization with executive power, agency or any other organization that is not identical with the data subject, the data controller, the data processor or the persons who have been authorized to manage personal data under the direct control of the data controller or data processor.

#### V.) **Our general privacy policy principles**

1. legality, fair treatment and transparency
2. purposefulness
3. data minimization
4. precision
5. limited storage
6. integration and privacy
7. accountability

The managed personal data must meet the following requirements:

1. their recording and management is fair and legal;
2. they are precise, complete, and, if necessary, timely;
3. their storage method is such that the data subject can be identified only for the duration of the purpose of the storage.

Personal data can only be transferred, and different data managements joined only if you specifically give consent, or the law makes it possible, and if all personal data meet the above mentioned conditions of data management.

The court, the prosecutor and the investigative authority, or other legally authorized agencies can contact HORESZ L LLC for the purposes of providing information, communication and transfer of data, or making documents available. The exact purpose of data management and the scope of the required data must be specified in the inquiry. The inquiry may involve only so many and such personal data that is necessary to achieve the purpose of the inquiry.

Data management connected to the services of HORESZ L LLC is either based on the unequivocal and voluntary consent of the data subject or on law. In case of consented data management, the consent can be withdrawn at any time.

The management of personal data is legal if it meets any of the conditions below:

1. the data subject has consented to the management of her/his personal data for one or more specific purposes;
2. data management is necessary to perform a contract where the data subject is a contractor, or when it is necessary in order to carry out the steps required by the data subject before the signing of the contract
3. data management is necessary to comply with the legal requirements towards the data controller;
4. data management is necessary to advocate the legitimate interests of the data controller or a third party, except when such interests or basic rights and freedoms of the data subject which require the protection of personal data take priority over these interests, especially when the data subject is a child.

We bring it to the data providers' attention that in case they are not providing their own personal data, it is the data provider's responsibility to secure the consent of the data subject.

#### **VI.) The purpose, legal grounds, duration of personal data management related to specific instances of data management**

##### **6.1. Management of user/customer data**

Scope of managed data: full name, phone number, e-mail address, invoice name and address

Purpose of data management: The unequivocal identification of customers making use of HORESZ L LLC's services, the performance of services for those entitled

Legal grounds of data management: the completion of contractual responsibilities, the possible advocacy of the legitimate interest of the data controller.

The management of personal data used for invoicing is to fulfill legal responsibilities and it follows the regulations of the law on Accounting.

Duration of data management: we delete data from our system at most 5 years after the end of the contract between us. An exception to this is data used for invoicing purposes, which, according to accounting regulations, are to be preserved for 8 years after the issue of the invoice. Thus, if the five years following the end of the contract falls before this time period, the deletion of data takes place after the time period of 8 years at the earliest.

##### **6.2 Phone and e-mail data related to our services**

Scope of managed data: full name, phone number and/or e-mail address (depending on the mode of contact)

With questions and problems related to the services of HORESZ L LLC, our customers and potential customers can reach us at the contact information provided under the Contact option on our homepage [www.horesz-l.com](http://www.horesz-l.com) or at [info@horesz-l.com](mailto:info@horesz-l.com)

Personal data you provide on this interface will be managed in two ways, depending on whether

a) You are our customer already:

6.1. outlines the management of your personal data both in terms of its legal grounds and the purpose and duration of the management.

b) You are our potential customer or merely an interested person:

Scope of managed data: same as the previous

Purpose of data management: to provide precise, full answer to your inquiry

Legal grounds of data management: your unequivocal consent

Duration of data management: if you do not wish to become our customer after receiving our answer, we will immediately and automatically delete your data from our records. In case you become our customer, refer to 6.1.

### **6.3 Storage and security of personal data**

When choosing, procuring, and operating its IT tools, HORESZ L LLC considers and ensures that the managed personal data is accessible only to those authorized, and their origin is verifiable and authentic.

HORESZ L LLC implements technical, IT, organizational and within-organizational measures to maintain the security of data management, and to provide suitable protection levels related to the risks of data management.

HORESZ L LLC will do all in its power against computer-assisted fraud, espionage, sabotage, vandalism, blaze and deluge, and against computer viruses, theft, and denial-of-service attacks. Moreover, HORESZ L LLC implements server-level and application-level protective measures to ensure security.

HORESZ L LLC informs users that regardless of protocol (e-mail, web, ftp, etc.), electronic messages sent via the internet are vulnerable to network threats that lead to foul actions,

contract contestation, or the disclosure or modification of information. HORESZ L HUNGARY LLC performs all and every possible security measure in its power to guard against such threats. It monitors the systems in order to record all security discrepancies and to secure evidence.

## VII.) **Options for legal redress**

### **7.1 Do not hesitate to contact us**

Based on relevant law, you have the following options to advocate for your rights related to personal data.

1. *Right to require information:* At the provided contacts you can require information about the type of data we manage, the legal grounds, the purpose of data management, its source and duration. Immediately upon your request, but within 30 days at most we will send the information to the e-mail address you have provided.
2. *Right to correction:* At the provided contacts, you can ask us to modify your data. We will act upon your request immediately but within 30 days at most, and we will inform you about the completed action at the e-mail address you have provided.
3. *Right to deletion:* At the provided contacts, you can ask us to delete your data. We will act upon your request immediately but within 30 days at most, and we will inform you at the e-mail address you have provided. For your information, data managed as part of the Data Controller's obligation, and data necessary to fulfill the contract cannot be deleted until the contract is in effect.
4. *Right to blocking:* At the provided contacts, you can ask us to block your data. Blocking lasts until the reason you provide renders data storage necessary. We will act upon your request immediately but within 30 days at most, and we will inform you at the e-mail address you have provided.
5. *Right to protest:* At the provided contacts, you can protest against data management. Upon filing, your protest will be addressed as soon as possible but within 15 days at most, we will make a decision regarding its validity, and we will inform you about the decision in an e-mail.

In case you experience data management you believe to be illegal, contact our company so as to facilitate the expedite restoration of legal status. For your benefit, we will do everything to redress the problem.

## **7.2 Hungarian National Authority for Data Protection and Freedom of Information**

Anyone can file a request of investigation with the Authority, citing that an abuse of right related to the management of personal data has taken place or a direct risk of it exists.

Contact information of the Authority:

Headquarters: 22/c Szilágyi Erzsébet fasor, Budapest, 1125

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Homepage: [www.naih.hu](http://www.naih.hu)

## **7.3 Legal enforcement of rights**

In case of an infringement of rights, the concerned person can file a legal appeal against HORESZ L LLC. The court will give expedite status to the case.

The lawsuit falls under the authority of the Metropolitan Court of Budapest, but the concerned person may appeal to the authorized and competent court at their place of residence.

Issues not outlined in detail in the present policy are to be addressed according to the regulations of Data Protection Act and GDPR.

March 20 2024, Budapest