

## **Data management notice of EFTTEX Trading Kft.**

### **1. The goal of the data management notice**

EFTTEX Trading Kft. (1041 Hungary, István Road 16. 1/6, hereafter service provider or controller) as controller, acknowledges the content of this legal notice as binding. It is obligated to ensure that all data management actions related to its activities meets the requirements set out in these regulations and in the applicable national legislation, as well as in the legal acts of the European Union.

The data protection guidelines regarding the data management of EFTTEX Trading Kft. are continuously available at <https://eftta-php-app.azurewebsites.net/>.

EFTTEX Trading Kft. reserves the right to change this notice at any time. Of course, it will notify its audience regarding any changes in due time.

If you have any questions or comments related to this data protection notice, please write to us at [info@efttex.com](mailto:info@efttex.com) and our colleague will answer your question.

EFTTEX Trading Kft. is committed to protect the personal data of its partners and considers it of utmost importance to respect its partners' right to self-determination regarding information. EFTTEX Trading Kft. treats all personal data confidentially and takes all security, technical and organizational measures to guarantee data security.

EFTTEX Trading Kft. describes its data management practices below.

### **2. Information on the data controller**

If you would like to contact our Company, you can contact the data controller at [info@efttex.hu](mailto:info@efttex.hu). EFTTEX Trading Kft. deletes all incoming e-mails, together with the related personal data, after a maximum of 5 years from the date of communication.

Name: EFTTEX Trading Kft.

Registered office: H-1041 Budapest, István road 16. 1. floor 6.

Company registration number: 01-09-399827

Registering court: Pest County Court

Tax number: 27834316-2-41

Phone number:

E-mail: [info@efttex.hu](mailto:info@efttex.hu)

### **3. Scope of managed personal data**

#### **3.1 Personal data to be provided during registration**

Mandatory data to be provided for registration: company name, EFTTA membership, first name, last name, position, address, phone number, e-mail address, website.

#### **3.2 Technical data**

EFTTEX Trading Kft. chooses and operates the IT tools used for the management of personal data during the provision of the service in such a way that the managed data:

- is accessible to those authorized to do so (availability);

- its authenticity and authentication are ensured (authenticity of data management);
- its immutability can be verified (data integrity);
- and is protected against unauthorized access (data confidentiality).

EFTTEX Trading Kft. protects the data with appropriate measures against unauthorized access, change, transmission, disclosure, deletion, or nullification, as well as against accidental destruction.

EFTTEX Trading Kft. ensures the protection of the security of data management with technical, organizational, and organizational measures that provide a level of protection corresponding to the risks associated with data management.

EFTTEX Trading Kft. during data management preserves

- confidentiality: protects the information, only those who are authorized can access it;
- integrity: protects the accuracy and completeness of the information and the processing method;
- availability: ensures that the authorized user can access the desired information when necessary and that the related tools are available.

### **3.3 Cookies**

#### **3.3.1 The task of the cookies**

Cookies

- collect information about visitors and their devices;
- remember the individual settings of the visitors, which may be used, e.g. when using online transactions, making data repetition unnecessary;
- facilitate website usage;
- provide a quality user experience.

To provide customized service, a small data package called cookie is placed in the computer of the user, which can be read again during the next visit. If the browser returns a previously saved cookie, the service provider managing the cookie is able connect the user's current visit with previous ones, but only regarding its own content.

#### **3.3.2 Mandatory (session) cookies**

The purpose of these cookies is to enable visitors to fully and smoothly browse [www.efttex.com](http://www.efttex.com), use its functions and the services available there. The validity period of this type of cookie lasts until the end of the session (browsing), when the browser is closed, this type of cookie is automatically deleted from the computer or other device used for browsing.

#### **3.3.3 Cookies placed by third parties (analytics)**

[www.efttex.com](http://www.efttex.com) also uses third-party cookies from Google Analytics and Facebook. By using the Google Analytics statistical purpose service and the Facebook tag, EFTTEX Trading Kft. collects information about how visitors use the website. The data is used for the purpose of developing the website and improving the user experience. These cookies also remain on the visitor's computer or other device used for browsing in the browser until they expire, or until the visitor deletes them.

#### **4. Planned use and retention period of the managed data**

Purport of data management: retention of data entered in the registration form (company name, EFTTA membership, first name, last name, position, address, telephone number, e-mail address, website)

Use: digital competition

Legal basis: voluntary contribution

Retention period: 5 years after registration

Purport of data management: EFTTEX 2022 Digital Best New Product Showcase

Use: promotion

Legal basis: voluntary contribution

EFTTEX Trading Kft. deletes all e-mails it receives, together with the related personal data, after a maximum of 5 years from the date of communication.

#### **5. Purpose, method, and legal basis of data management**

##### **5.1 General data management guidelines**

The data management of EFTTEX Trading Kft.'s activities is based on voluntary consent and legal authorization. In the case of data processing based on voluntary consent, the data subjects may withdraw their consent at any stage of the data processing.

In some cases, the management, storage, and transmission of a part of the provided data is legally compulsory, of which we notify our customers separately.

We draw the attention of data informants to EFTTEX Trading Kft. that if they do not provide their own personal data, the data informant must obtain the consent of the data subject.

The data management principles are in line with the current legislation on data protection, and specifically with the following:

- Act 2011 / CXII. - on the right to self-determination of information and freedom of information;
- EU regulation 2016/679 of the European Parliament and the EU Council (April 27, 2016) - on the protection of natural persons with regard to the processing of personal data and the free flow of such data, as well as the repeal of Regulation 95/46/EC (General Data Protection Regulation, GDPR);
- Act 2013 / V. on the Civil Code;
- Act 2000 / C. on accounting;
- Act 2017 / LIII. – on the prevention and blocking of money laundering and terrorist financing;
- Act 2013/ CCXXXVII. – on credit institutions and financial enterprises.

## **6. The physical storage locations of the data**

Your personal data (that is, the data that can be linked to you) can get managed by us in the following ways: first, in connection with maintaining the Internet connection, technical data related to the computer, browser program, Internet address, and visited pages are automatically generated in our computer system, second, you can also provide your name, contact information or other data if you wish to contact us personally when using the website.

This data cannot be combined with other personal user data, except in cases mandatory by law. Only employees of EFTTEX Trading Kft. have access to the data provided on the contact form and during newsletter subscription.

## **7. Rights and remedy options of a data subject**

The data subject can request information about the management of his personal data and can request the correction of her/his personal data, or - except for mandatory data management - deletion or withdrawal, s/he can use his right to data portability as indicated when recording the data, or at the above contact details of the data controller.

### **7.1 Right to information**

EFTTEX Trading Kft. takes appropriate measures to provide the data subjects with all the information mentioned in Articles 13 and 14 of the GDPR and provide each piece of information according to Articles 15-22 and 34 regarding the handling of personal data in a concise, transparent, understandable, and easily accessible form, clearly and comprehensibly worded.

### **7.2 The data subject's right of access**

The data subject has the right to receive feedback from the data controller as to whether her/his personal data is being processed, and if such data processing is underway, s/he is entitled to access the personal data and the following information: the purposes of the data processing; categories of personal data concerned; the recipients or categories of recipients to whom the personal data has been or will be communicated, including in particular recipients in third countries and international organizations; the planned period of storage of personal data; the right to rectification, deletion or limitation of data processing and the right to protest; the right to submit a complaint to the supervisory authority; information about data sources; the fact of automated decision-making, including profiling, as well as comprehensible information about the applied logic and the significance of such data management and the expected consequences for the data subject. The data controller shall provide the information within a maximum of one month from the date of submission of the request.

### **7.3 Right to rectification**

The data subject may request the correction of inaccurate personal data concerning him/her managed by EFTTEX Trading Kft. and the completion of incomplete data.

### **7.4 Right to deletion**

If one of the following reasons exists, the data subject is entitled to request EFTTEX Trading Kft. to delete the personal data relating to him/her without undue delay:

- personal data are no longer needed for the purpose for which they were collected or otherwise processed;

- the data subject withdraws the consent that forms the basis of the data management, and there is no other legal basis for the data management;
- the data subject objects to data processing and there is no overriding legal reason for data processing;
- personal data were handled illegally;
- personal data must be deleted in order to fulfill the legal obligations prescribed by EU or member state law applicable to the data controller;
- the collection of personal data took place in connection with the offering of services related to the information society.

Data deletion cannot be initiated if data management is necessary: for the purpose of exercising the right to freedom of expression and information; for the purpose of fulfilling the obligation according to EU or Member State law applicable to the data controller, which prescribes the processing of personal data, or for the execution of a task performed in the public interest or in the context of the exercise of public authority conferred on the data controller; relating to the field of public health, or for archival, scientific and historical research or statistical purposes, based on public interest; or to submit, assert or defend legal claims.

### **7.5 The right to restrict data processing**

At the request of the data subject, EFTTEX Trading Kft. restricts data processing if one of the following conditions is met:

- the data subject disputes the accuracy of the personal data; in which case the restriction applies to the period until checking the accuracy of the personal data;
- the data management is illegal, and the data subject opposes the deletion of the data and instead requests the restriction of its use;
- the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to submit, enforce or defend legal claims; or the data subject objected to data processing; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the data controller take precedence over the legitimate reasons of the data subject.

If data management is subject to restrictions, personal data may only be processed with the consent of the data subject, with the exception of storage, or to submit, enforce or defend legal claims, or to protect the rights of another natural or legal person, or in the important public interest of the Union or a member state.

### **7.6 Right to data portability**

The data subject has the right to receive the personal data concerning him/her provided to the data controller in a segmented, widely used, machine-readable format, and to transmit this data to another data controller.

### **7.7 Right to object**

The data subject has the right to object at any time, for reasons related to his own situation, to the processing of his personal data necessary for the execution of a task carried out in the public interest or within the framework of the exercise of public authority conferred on the data controller, or the

processing necessary to assert the legitimate interests of the data controller or a third party, including profiling based on the aforementioned provisions. In the event of an objection, the data controller may no longer process the personal data, unless it is justified by compelling legitimate reasons that take precedence over the interests, rights and freedoms of the data subject, or that are related to the submission, enforcement or defense of legal claims.

#### **7.8 Automated decision-making in individual cases, including profiling**

The data subject has the right not to be covered by the scope of a decision based solely on automated data management, including profiling, which would have a legal effect on her/him or affect her/him to a similar extent.

#### **7.9 Right of withdrawal**

The data subject has the right to withdraw her/his consent at any time.

#### **7.10 Right to go to court**

In the event of a violation of their rights, the data subject may apply to the court against the data controller. The case has preferred treatment in the court.

#### **7.11 Data protection official procedure**

Complaint can be filed with the National Data Protection and Freedom of Information Authority:

Name: National Data Protection and Freedom of Information Authority

Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Mailing address: 1530 Budapest, Pf.: 5.

Phone: 0613911400

Fax: 0613911410

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

Website: <http://www.naih.hu>

### **8. Other provisions**

We provide information on data management not listed in this notice when the data is collected.

We inform our customers that the court, the prosecutor, the investigative authority, the infringement authority, the public administrative authority, the National Data Protection and Freedom of Information Authority, the Hungarian National Bank, or other bodies based on the authorization of the law, can contact the data controller to provide information to other organizations, to communicate data, or to transfer documents.

EFTTEX Trading Kft. will only release personal data to the authorities - if the authority has specified the exact purpose and the scope of the data - to the extent and by the amount that is absolutely necessary to fulfill the purpose of the request.