

# DATA MANAGEMENT INFORMATION

This document contains the information of the operator of the website of **Medence Csoport Ltd.**, 1118 Budapest, Ménesi út 1. (hereinafter referred to as the "**Service Provider**"), <https://medencedesign.com> and <https://medencecsoport.hu> / (hereinafter referred to as the "**Data Controller**") regarding the processing of personal data provided by the persons who provide personal data on the website (hereinafter referred to as the "**Data Subject**").

Contact details:

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

Telephone number: +36 70 338 7001

This privacy notice has been prepared in accordance with the rules of the General Data Protection Regulation 2016/679 of the European Parliament and of the Council (hereinafter: the Regulation).

## 1. Contact form

### **Description of the processing scope, purpose of processing and scope of the data processed**

On the Website, we provide you with the opportunity to contact us directly by filling in and submitting the contact form. In the form, you will be asked to provide your name (company name), e-mail address, telephone number and your message.

The data will be processed in connection with your enquiry in order to manage your enquiry.

### **Legal basis for processing**

The legal basis for processing is your consent pursuant to Article 6(1)(a) of the Regulation.

### **Duration of processing**

We process the data for as long as we process your contact request.

## 1.2. Processing of data relating to the sending of newsletters

The data processing is carried out for the purpose of sending out newsletters.

### **Data processed**

Name, e-mail address.

Duration of processing

The processing is carried out until the withdrawal of the data subject's consent.

### **Legal basis for processing**

Your voluntary consent, which you give to the Data Controller by subscribing to the newsletter [processing under Article 6(1)(a) of the Regulation].

## 2. Data processors

We use data processors for the processing of your data:

- Tárhely.Eu Szolgáltató Kft. (Budapest, Könyves Kálmán krt. 12-14, 1097.; tarhely.eu) who is responsible for the hosting service.

## 3. Your rights in relation to data processing

For the duration of the processing, you have the following rights under the Regulation:

- Access to personal data and information relating to the processing,
- the right to rectification,
- restriction of processing,
- the right to access, rectify and oppose the processing of personal data
- right to access, rectification, cancellation, right to erasure, right to portability,
- right to object,
- right to withdraw consent.

If you wish to exercise your rights, this will involve identifying yourself and we will need to communicate with you. Therefore, in order to identify you, you will be required to provide personal data (but identification will only be based on data that we already hold about you) and your complaint about our processing will be available in our email account for the period of time specified in this notice in relation to complaints.

We will respond to complaints about processing within 30 days at the latest.

### 3.1. Right to withdraw consent

You have the right to withdraw your consent to data processing at any time, in which case the data will be deleted from our systems.

### 3.2 Access to personal data and information

You have the right to receive feedback as to whether your personal data is being processed and, if it is being processed, you have the right to:

- to have access to the personal data processed; and
- be informed of the following information:
  - o the purposes of the processing;
  - o the categories of personal data processed about you;
  - o information about the recipients or categories of recipients to whom or with which the personal data have been or will be disclosed;
  - o the envisaged duration of the storage of the personal data or, where this is not possible, the criteria for determining that duration;
  - o your right to request the rectification, erasure or restriction of the processing of personal data relating to you and, in the case of processing based on legitimate interests, to object to the processing of such personal data;
  - o the right to lodge a complaint with a supervisory authority;
  - o where the data have not been collected from you, any available information about their source;
  - o the fact of automated decision-making (where such a process is used), including profiling, and, at least in these cases, clear information on the logic used and the significance and likely consequences for you of such processing.

The purpose of exercising this right may be to ascertain and verify the lawfulness of the processing, and we may charge a reasonable fee for providing the information in return for repeated requests for information.

Access to your personal data will be ensured by sending you the personal data and information processed by e-mail after you have been identified.

Please indicate in your request whether you want access to the personal data or information about the processing.

### 3.3 Right to rectification

You have the right to have inaccurate personal data relating to you corrected without delay at your request.

### 3.4. Right to restriction of processing

You have the right to restrict processing at your request if one of the following conditions is met:

- You contest the accuracy of the personal data, in which case the restriction will apply for a period of time that allows us to verify the accuracy of the personal data, if verification is not necessary, no restriction will be applied;
- If the processing is unlawful and you oppose the erasure of the data and instead request a restriction of their use;
- we no longer need the personal data for the purposes for which they are being processed but you require them for the establishment, exercise or defence of legal claims; or
- you have objected to the processing, but we may have a legitimate interest in the processing, in which case, pending a determination of whether our legitimate grounds override your legitimate grounds, the processing should be restricted.

Where processing is restricted, such personal data, other than for storage, may only be processed with your 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 important public interests of the Union or of a Member State.

You will be informed in advance (at least 3 working days before the restriction is lifted) of the lifting of the restriction on processing.

### 3.5 Right to erasure - right to be forgotten

You have the right to have your personal data erased without undue delay if one of the following grounds applies:

- the personal data is no longer necessary for the purposes for which it was collected or processed;
- You withdraw your consent and there is no other legal basis for the processing;
- You object to the processing based on legitimate interests and there is no overriding legitimate ground (i.e. legitimate interest) for the processing,
- the personal data have been unlawfully processed and this has been established on the basis of the complaint,
- the personal data must be erased in order to comply with a legal obligation under EU or Member State law applicable to us.

If we have disclosed personal data we hold about you for any lawful reason and we are required to delete it for any of the reasons set out above, we will take reasonable steps, including technical measures, taking into account available technology and the cost of implementation, to inform other data controllers that you have requested the deletion of links to or copies of the personal data in question. As a general rule, your personal data will not be disclosed.

Erasure does not apply where the processing is necessary:

- for the exercise of the right to freedom of expression and information;
- to comply with an obligation under EU or Member State law that requires the processing of personal data (such as processing in the context of invoicing, where
- to bring, enforce or defend legal claims (e.g. if we have a claim against you and you have not yet satisfied it, or if you are the subject of a consumer or data management complaint).

### 3.6. Right to object

You have the right to object to the processing of your personal data based on legitimate interests at any time on grounds relating to your particular situation. In this case, we may no longer process the personal data unless we can prove that the processing is justified by compelling legitimate grounds which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

### 3.7 Right to portability

Where the processing is necessary for the performance of a contract or is based on your voluntary consent, you have the right to request to receive the data you have provided to us in a machine-readable format, which we will make available to you in xml, JSON or csv format, and, if technically feasible, to request that we transfer the data in this format to another controller.

### 3.8. Legal remedies

If you believe that we have violated a legal provision applicable to data processing or have failed to comply with a request, you may initiate an investigation procedure with the National Authority for Data Protection and Freedom of Information (postal address: 1530 Budapest, PO Box 5, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)) to stop the alleged unlawful processing.

You are also informed that you may also bring a civil action before a court.

## 4. Data security

In the operation of our IT systems, we have put in place the necessary rights management, internal organisation and technical solutions to ensure that your data cannot be accessed, deleted, deleted from the system or modified by unauthorised persons. We also enforce data protection and data security requirements with our data processors.

We keep records of any data breaches and, where necessary, we will inform you of any incidents that occur.

## 5. Other provisions

We reserve the right to modify this Privacy Notice in any way that does not affect the purpose and legal basis of the processing.

If, however, we intend to carry out further processing of the data collected for purposes other than those for which they were collected, we will inform you of the purposes of the processing and the information below before carrying out the further processing:

- the period for which the personal data will be stored or, if this is not possible, the criteria for determining that period;
- your right to request access to, rectification, erasure or restriction of the processing of personal data concerning you and, in the case of processing based on legitimate interest, to object to the processing of personal data and, in the case of processing based on consent or a contractual relationship, to the processing of personal data relating to you
- in the case of processing based on consent, that you can withdraw your consent at any time,
- your right to lodge a complaint with a supervisory authority;
- whether the provision of the personal data is based on a legal or contractual obligation or is a precondition for the conclusion of a contract, whether you are under an obligation to provide the personal data and the possible consequences of not providing the data;
- the fact of automated decision-making (where such a process is used), including profiling, and, at least in these cases, clear information about the logic used and the significance and likely consequences for you of such processing.

Processing may only start thereafter, if the legal basis for the processing is consent, to which you must give your consent in addition to the information.

**This Privacy Notice is valid from 01.06.2023.**