

**Data Protection Information****DATA PROTECTION INFORMATION ABOUT CONTROLLING PERSONAL DATA AS FROM 25 MAY 2018**

Based on Articles 13 and 14 of 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 (General Data Protection Regulation, hereinafter "GDPR") the Data Controller hereby gives the following information on the procession of personal data of data subjects.

	<b>Data Controller:</b>
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**I. RULES OF LAW PROVIDING BASIS FOR DATA PROSESSION:**

1. 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 (General Data Protection Regulation)
2. Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereinafter: Information Act)

By virtue of 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 a 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;

"**Recipient**" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

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Target of data procession	see Annex
Legal basis of data procession:	see Annex
Storing period:	see Annex
Lists, categories:	see Annex
Source:	see Annex

As a main rule the personal data enlisted in the Annex are provided by the data subject at his/her own discretion. If such data are to be provided on the basis of rules of law or contractual obligation or as a result of contract conclusion, the data subject shall give the personal data enlisted in the Annex, the failure of which may lead to the following legal consequences:

- request of data for the fulfillment of a legal obligation: fulfillment becomes impossible
- request of data for contract conclusion: failure of concluding the contract
- request of data for utilizing services: refusing the service provision
- request of data for security purposes: restricting, banning entry

**II. WHO MAY LEARN YOUR PERSONAL DATA?**

As a main rule the personal data of the data subject may be learnt by the employees of the Data Controller for the fulfillment of their duties. For example the Data Controller's employees in charge of filing or the HR colleague may learn the data subject's personal data for administering and compiling the labor contract, respectively. The Data Controller may convey the personal data of the data subject to other state organs only in exceptional cases. For example, if legal action is instituted concerning a legal dispute between the data subject and the Data Controller, the documents containing the personal data of the data subject shall be delivered to the acting court, the police shall contact the Data Controller and ask for the delivery of the documents containing the data subject's personal data for investigation. In addition, the lawyer acting as the legal representative of the Data Controller may also learn the personal data if there is a legal dispute between the data subject and the Data Controller.

**III. DATA SAFETY MEASURES**

The Data Controller shall store the personal data provided by the data subject at his seat or registered branch. The Data Controller shall make use of the service of the data processor figuring in the Annex for the procession of the personal data of the data subject.

Through appropriate information safety measures the Data Controller shall arrange for the personal data of the data subject to be protected against unlawful access or changing. For example, the access to personal data stored on servers shall be logged, based on which it can be checked who and when had access to what data. Through appropriate organizational measures the Data Controller shall arrange for the personal data to be protected against accesses by an indeterminate number of people. Hardcopy data carriers are stored in a locked separate room,

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in the archives of our company, in a lockable safe box. The key of the archives and that of the safe box are protected by fingerprints and stored in a key box that can be opened. The right of access is subject to positions and jobs i.e. it is restricted.

**IV. TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS**

Name of the third country or international organization	Irrelevant
Compliance decree of the EU Commission, for lack of such, guarantees:	Irrelevant
Compulsory company rule:	Irrelevant
Diversions concerning special situations	Irrelevant

Please, be informed that our company as a member of the Sagemcom company group transfers personal data to the parent company i.e. Sagemcom Energy& Telecom SAS - FR 92500 Rueil Malmaison, route de l'Empereur 250., registration number of foreign company, association: 518 250 337, registration of foreign company, association: R.C.S. Nanterre. Our company does not transfer data to business associations, public authorities or other legal subjects in other states of the European Union or in states outside the Union.

**V. YOUR RIGHTS**

Based on Article 15 of GDPR the data subject may ask for access to his/her personal data 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 personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- (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;

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- (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, referred to in Article 22(1) and (4) 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.

Based on Article 16 of GDPR the data subject has the right to ask the Data Controller to correct his/her data.

The data subject shall have the right to obtain from the controller without undue delay the rectification of 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.

Based on Article 17 of GDPR the data subject has the right to ask the Data Controller to delete his/her personal data in accordance with the following:

(1) The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay 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 and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- (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 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

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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 above right of the data subject may be restricted only if the following exceptions apply, i.e. when such conditions are met the ongoing storing of personal data is considered as lawful:

for exercising the right of freedom of expression and information, or;

- (b) for compliance with a legal obligation, or
- (c) for compliance of duties in public interest, or
- (d) in the exercise of official authority vested in the controller, or
- (e) for reasons of public interest in the area of public health, or
- (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 defense of legal claims.

Based on Article 18 of GDPR 18 the data subject has the right to ask the Data Controller to restrict the procession of his/her personal data in accordance with the following:

(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 defense of legal claims or;
- (d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted based on the 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 defense 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.

Based on Article 21 of GDPR 21 the data subject has the right to object to the procession of his/her personal data as follows:

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(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, 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 or for the establishment, exercise or defense 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 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, shall 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.

Based on Article 20 of GDPR 20 the data subject has the right to ask for portability of his/her personal data in accordance with the following:

(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 processing is based on consent of or contract conclusion with the data subject; and
- (b) the processing is carried out by automated means.

2. In exercising his or her right to data portability pursuant to paragraph 1, 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 of portability shall be without prejudice to the right to erase. That right 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.

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4. The right of portability 1 shall not adversely affect the rights and freedoms of others.

Based on Article 7(3) of GDPR the data subject has the right to withdraw his/her consent at any time in accordance with the following:

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. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

## **VI. DATA SUBJECT'S RIGHT TO AN EFFECTIVE JUDICIAL REMEDY AGAINST A SUPERVISORY AUTHORITY**

When unlawful data procession is learnt, the data subject has the right to initiate legal actions against the Data Controller. The proceedings shall be conducted by the court. At the discretion of the data subject the legal action may be instituted before the court at his/her place of residence.

Without prejudice to any other administrative or non-judicial remedy, each data subject has the right to lodge in a complaint with a supervisory authority – with special regard to member states at his/her place of abode, place of work or the alleged infringement – if the data subject thinks that the procession of his/her personal data breaches the provisions of GDPR.

### **National Authority for Data Protection and Freedom of Information (NAIH)**

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## **VII. AMENDMENT TO THE DATA PROTECTION INFORMATION**

Please, be informed that our present information may change from time to time in accordance with rules of law, governing authority – court – practice and measures, or as a result of our resolutions. Changes will be published on our webpage before they come into force.

## **VIII. ANNEX**

Target of data procession	Data categories	Period of procession	Legal grounds of procession	Source	Recipient, if any	Aim of communication =if
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						there is a recipient )
Conclusion of the labor contract /compiling, amending, terminating the document connected with the appointment, recording data for records, their utilization, storing, deletion.	Name, member company effected by the contract, start and end of the contract, Remuneration	Termination of the labor relation, other legal relation	Performance of contracts, legitimate interest	directly the data subject	Sagemcom Magyarország Kft.	No data transfer.
Recording, utilizing, storing, transferring and deleting the data of the data subject related to the wage and other benefits	Name, member company effected by the contract, start and end of the contract, Remuneration, Tax ID, Social security ID	Termination of the labor relation, other legal relation	Performance of contracts and legal obligations	directly the data subject	Sagemcom Magyarország Kft.  Nexon Kft.	Payment
Reporting to NAV (tax authority), TB (social security), data provisions, statistical data provisions, other data provision to health care / authorities in relation to the labor relation, recording, storing, utilizing, deleting data for relevant records (e.g. ability to work, aptitude training).	Name, date of birth, place of birth, mother's name, residence, company affected by the contract, start and end of the contract, remuneration	Performance of the employer's obligation provided for in Section 46 of Act LXXX of 1997	Legal obligation	directly the data subject	Sagemcom Magyarország Kft.  Organ authorized by rules of law	Data provision provided for by rules of law
Document of human applicant (CV and annexes)	Name, contact data, professional information	Term given by the service provider when data are provided by him, and the termination of the legitimate interest for other data.	Voluntary	directly the data subject	Sagemcom Magyarország Kft.	No data transfer.
Group phone register (recording, registering, storing, deleting)	Name, company name, position, phone number, email address, photo when consent is given	Termination of the labor relation, other legal relation	Legitimate interest. Consent for photos	directly the data subject	Sagemcom Magyarország Kft	No data transfer
Administration duties, recording, invoice handling, in relation to mobile phone services, mobile internet access or relevant electronic telecommunications services, recording, storing, utilizing and deleting data for internal cost management.	Name, residence, phone number, master number	Termination of the labor relation, other legal relation	Termination of the labor relation, other legal relation	directly the data subject	Sagemcom Magyarország Kft.  Telenor Magyarország Zrt.	business relevance, for settlement and number portability

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Administration duties, recording, invoice handling, in relation to requiring, amending and terminating IT and information services. Recording, storing, utilizing and deleting relevant data.	Name, date of birth, place of birth, mother's name, residence, phone number, email address, citizenship, company name, seat/branch/office, position, IT ID, user name, title of right	Termination of labor relation, other legal relation	Legitimate interest	directly the data subject	Sagemcom Magyarország Kft.  WoltersKluwer Kft.  Opten Kft.  CreditControl	Setting access to the information service (rules of law, company registry)
Handling users' reports, recording services used by users, incident handling, change handling, problem handling, event handling  in standby system	Name, phone number, email address, company name, seat/branch/office, position, IT ID, user name, title of right	Termination of labor relation, other legal relation	Legitimate interest	directly the data subject	Sagemcom Magyarország Kft.	No data transfer
Operating the entry system for entering the territory of the company, recording fingerprints (code generated by software), applying for entry cards, their recording, authorizing, recording and using the data generated by passing the entry points	Name, master number, photo, place of work, organizational unit, type of the entry card, card number, fingerprint, permits, car registration number, if applicable	Data generated in the course of operation: 6 months from the termination of the authorization  Data processed for operation: termination of the authorization	Legitimate interest	directly the data subject	Sagemcom Magyarország Kft.	No data transfer
Operating the video surveillance on the territory of our company because of the pandemic and life and property security (checking by thermal camera, recording, using the records)	Image	recording + 15 workdays,	legitimate interest	directly the data subject	Sagemcom Magyarország Kft.	No data transfer
Holding compulsory work and fire protection training course, related recording. Storing, using deleting the data.	Name, signature (in minutes)	According to the rules on document handling	Legal obligation.	directly the data subject	Sagemcom Magyarország Kft.	No data transfer
Storing, using and deleting specimen of signature, signature samples, etc. for the performance of court of registry obligations. Recording, storing, using and deleting data to this end.	Name, date of birth, place of birth, mother's name, ID card number, social security ID, Residence, residence card number, tax ID, company name, company address, job, position	Termination of the labor relation, other relation	Legal obligation	directly the data subject	Sagemcom Magyarország Kft.	Performance of the legal obligation connected with the registration by the court of registry

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Recording, storing, using, transferring and deleting data for processing personal data related to ID provisions stipulated by rules of law to the end of complying with data identification rules of law (e.g. requesting data for public interest, anti-money laundering act, company gate, etc.).	Name, date of birth, place of birth, mother's name, ID card number, social security ID, residence, residence card number, tax ID, company name, company address, job, position	Storing period according to the subject of the document	Legal obligation	directly the data subject	Sagemcom Magyarország Kft.	No data transfer
Filing, administering documents containing personal data when such are received or generated when governing statutory provisions are observed, recording the name of the sending/receiving party when documents are stored, inspecting such in related to their administering	Tax ID, bank account number	Storing period according to the subject of the document	Legitimate interest, legal obligation	directly the data subject, other data controllers	Sagemcom Magyarország Kft.	
Processing personal data related to electronic systems and certain documents regarding the management of contracts in harmony with rules of law on contracts, in respect of contact persons and representatives enlisted in the contract. Recording the data in the electronic database, their storing, using and deleting.	Name, place of birth, date of birth, mother's name, residence, tax number/tax ID, entrepreneur's card number, bank account number	Storing period according to the subject of the document	Legal obligations, legitimate interest	directly the data subject, other data controllers	Sagemcom Magyarország Kft.  Contracting party	Availability of the contract copy
Displaying photos, positions in relation to professional documents in printed form or on the intranet or internet homepage of the Company or the Group, on other internet pages, and recording, storing, transferring, using and deleting the data to this end.	Name, position, photo	Termination of the display	Legitimate interest	directly the data subject	Sagemcom Magyarország Kft.  contracting party  publisher	For editing and publishing publications, external and internal journals
Collecting and recording data for administration in relating to participants for the purpose of taking part in programs and conferences organized by an external party	Name, position, phone number, email address, place of work, address of place of work, internet address	Termination of the labor relation, other legal relation	Consent	directly the data subject	Sagemcom Magyarország Kft.  contracting party	Monitoring the number of participants for administrative purposes and for checking entry and

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						identificati on
Recording, storing, transferring and deleting data for the identification of applicants when business cards are ordered.	Name, position, phone number, email address, place of works, its address, internet address	Termination of the labor relation, other legal relation	Legitimate interest	directly the data subject	contracting party of exhibitions	
Administrative duties related to documents enlisted in the rules of using vehicles for property protection and checking the employee/other user, keeping records on rights to use key vehicles, keeping records on own vehicles, keeping records on breaches of rules, parking data, vehicle sales, processing personal data in relation to the operation of the vehicles (servicing, damage events, GPS), their recording, using, transferring and deleting.	Name, date of birth, place of birth, mother's name, residence, residence card number, notification address (place of abode), email address, phone number, ID card number, driving license number, company name, job, position, organizational unit	Termination of the labor relation, other legal relation	Legitimate interest, consent	directly the data subject	Sagemcom Magyarország Kft.  Rapid Rent Kft.  Shiller Flottakezelő Kft.	Administra tive duties
In the course of public procurement storing, using, transferring and deleting CVs and document copies certifying the qualification necessary for data provision in compliance with tender stipulations	Name, date of birth, place of birth, mother's name, residence, residence card number, notification address (place of abode, email address, phone number, ID card number, driving license number, social security ID, tax number/tax ID, citizenship, company name, job, position, organizational unit, data concerning studies and the labor relation	Term of the contract, after its termination: lapse of possible claims	Legitimate interest, consent, Contractual obligation	directly the data subject	Sagemcom Magyarország Kft.  Party inviting the tender for public procurements	Identificati on, retrieval
In case of force majeure – including but not limited to wars, revolutions, terrorism, fires, natural disasters, quarantine, epidemic, reported general strikes – data of persons other than employees, who enter the territory of the business association, which are appropriate for identification, e.g. for detecting preliminary	Name, represented company and the position held there, staying abroad in the past period	End, lapse of the force majeure event	Legitimate interest, consent	directly the data subject	Sagemcom Magyarország Kft., competent authority	Identificati oin, retrieval

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events and reconstructing actual events						
In case of force majeure – including but not limited to wars, revolutions, terrorism, fires, natural disasters, quarantine, epidemic, reported general strikes – employees’ data concerning their travels for protecting the rights of healthy colleagues and for providing a healthy working environment	Name, position, data of travels	End, lapse of the force majeure even	Legitimate interest, consent	directly the data subject	Sagemcom Magyarország Kft., competent authority	Identification, retrieval