

PRIVACY POLICY

Information security and data protection is a priority for our company. This privacy policy details our commitment to protecting your personal data in accordance with the relevant legislation.

I. Who will process your personal data?

Data controller: **TORONYÓR Zrt.**
 Registered seat: 1054 Budapest, Szabadság tér 7. -1
 Tax ID: 25093386-2-41
 Phone number: +36 1 302-9010
 E-mail address: info@toronyor.net

II. How, why and for how long does our company process your data?

Purpose of processing	Description of processing	Types of personal data processed	Legal basis of processing	Duration of processing
Job applications	Our company processes the personal data provided to us by the solicited and unsolicited CVs and other documents attached to the job application. The purpose of data processing is to notify the applicant of any job opportunities matching their qualifications and interests, as well as making an appointment with the applicant and performing the application procedure.	The personal data provided by the applicant to us in the CV and other attached documents.	The legal basis of processing personal data is the legitimate interest of the data subject and our company [GDPR Art. 6. Sect. (1) Par. f)], so that employment may be established if both parties agree.	<u>For an announced position:</u> In case of a successful application the duration of the employment, in case of an unsuccessful application for 3 (three) months after the hiring is concluded or until the request of the applicant to delete their personal data. <u>For an unsolicited application:</u> for 3 (three) months after the application is sent or at the time the request of the applicant is made to delete their personal data.
Questions, inquires and quotations	In connection with inquiries and quotation requests made in person, or through the website, e-mail or over the phone, our company shall process the personal data provided to us in the questions, inquires and quotations by the data subject. The purpose of data processing is establishing and staying in contact, as well as providing information and quotation to the interested party so that they may engage our services.	The personal data provided to us in the questions, inquires and quotations by the data subject, as well as any contact (telephone number, e-mail address) and other information necessary to enter into a contract.	<u>In the event the parties enter into a contract as a result of the questions, inquires and quotations</u> is the entering into and performance of contract between data subject and our company [GDPR Art. 6. Sect. (1) Par. b)]. <u>In the event the parties do not enter into a contract as a result of the questions, inquires and quotations</u> is the legitimate interest of our company [GDPR Art. 6. Sect. (1) Par. f)].	In the event a contract is not entered into, our company processes the personal information until such time that the data subject requests their deletion. If a contract is entered into then the duration of the processing is as described below.
Contracts	The company processes the data of other business entities and their employees that is necessary for the entering into and performance of the contract between the purchaser/supplier and our company.	The personal data enclosed in the contract and the contact information (telephone number, e-mail address) necessary for the performance of the contract, as well as any additional data required to issue an invoice in accordance with the Accounting Act.	The legal basis of processing personal data is the performance of contract between data subject and our company [GDPR Art. 6. Sect. (1) Par. b)].	The duration of data processing is 8 (eight) years after the performance of the contract pursuant to the preservation obligation of the bills issued by the Company under the Accounting Act.
Electronic surveillance	Our company operates an electronic surveillance and recording system (CCTV) at its registered seat on its operational premises (indicated by notices and pictograms).	The camera system records only the picture and actions of the people entering the areas. The CCTV system is operated by our company, no data processor is involved.	The legal basis of processing personal data is the legitimate interest of the data subject and our company [GDPR Art. 6. Sect. (1) Par. f)]. You may read about this in our <u>balancing test on our website</u> .	The duration of the processing is 30 (thirty) business days from the date of the recordings, after this period the recordings shall be deleted automatically.

Direct marketing for businesses without existing business relations with us	Our company uses direct marketing to reach business entities with no prior business relations with us (<i>"cold" businesses</i>) in the sale of our products and services. In connection with this activity, we do not gather, process or utilize personal data, only the publicly available company and economic data of business entities, as well as generic business e-mail addresses that cannot be traced back to one identified or identifiable natural person.			
Direct marketing for businesses that requested quotations and our contractual partners (with existing business relations)	Our company processes the e-mail addresses of the businesses that requested quotations and our contractual partners in order to use these electronic contact information for direct sales of similar products or services to the customer.	The name and e-mail address of the natural person or the natural person employee of the business enterprise with an existing business relation with our company.	The legal basis of processing personal data is the consent of the data subject [GDPR Art. 6. Sect. (1) Par. a)]. Our company makes it a priority to comply with the provisions of § 6 of the Business Advertising Activity Act and paragraph 13 of the E-Privacy Directive. You may read about this in our balancing test on our website .	Our company processes the personal information until such time that the data subject requests their deletion. The option to unsubscribe is indicated in every direct marketing message.

III. Who do we share your personal data with?

Our company will never forward, sell or make your personal data available in any other way to third parties. However, we may need to share some information, including personal data, we obtain from your use of our service in the following circumstances.

a) **Complying with legal requirements**

Our company may transmit personal data if the applicable legal provisions so require, or when such action is necessary to comply with any laws, including to meet national security or law enforcement requirements.

b) **Protection of our claims, rights and interests**

We may also need to share personal data for the protection of our rights and interests, in accordance with the applicable laws.

c) **Using third-party service providers**

In certain cases we need to share information, including personal data with our third-party service providers. We use third-party service providers for a number of services, for example payment processing, payroll and other services. We require our third-party service providers to use the personal data that we share with them solely in connection with the services they provide to us.

1. **Axacont Kft. (registered seat: 2030 Érd, Fazekas u 5.; tax ID: 13121226-2-13)**

This provider provides accounting and payroll services to our company, therefore it acts as a data processor.

2. **Shadow Consulting Kft. (registered seat: 1054 Budapest, Szabadság tér 7.; tax ID: 23795082-2-41)**

This provider provides the IT infrastructure to our company, therefore it acts as a data processor.

IV. Situations where our company processes personal data on behalf and in the name of another company

Our company provides private security services to **TopTorony Ingatlanhasznosító Zártkörűen Működő Részvénytársaság** (registered seat: 1054 Budapest, Szabadság tér 7.; tax ID: 11878410241) with regards to the property under 1054 Budapest, Szabadság tér 7. (hereinafter: **"Bank Center"**) under a service contract as a data processor.

With regards to the data processing activities described below TopTorony Zrt. is the data controller. Our company act as the data processor processing the personal data regarding these activities as instructed by the data controller:

1. **Private security services**

Our company provides private security services in compliance with the Security Services Act (*including activities preventing acts of explosives*) to TopTorony Zrt. for the safe operation of Bank Center.

2. **Inspecting the security camera system**

Our company utilizes and maintains the fixed CCTV system at Bank Center that is the property of TopTorony Zrt. for the above mentioned private security services in the name and under the instruction of the data controller, TopTorony Zrt.

3. **Operating the electronic entry system and parking system**

Our company utilizes and maintains the fixed electronic entry system and parking system at Bank Center that is the property of TopTorony Zrt. for the above mentioned private security services in the name and under the instruction of the data controller, TopTorony Zrt. With regards to this activity, the following personal data is processed:

- a) for visitors' cards, as well as tenant and service provider cards the name and personal identification information of the card holder, as well as the fact and date and time of arrival and departure;
- b) for the operation of the parking system the licence plate number, as well as the fact and date and time of arrival and departure.

4. **Tasks related to indirect postal delivery**

Our company performs the tasks required in connection with indirect postal delivery as described in § 20 of the Postal Regulation in the name and under the instruction of the data controller, TopTorony Zrt.

5. **Handling of lost and found objects**

Our company operates as the drop-off/pick-up point for lost and found objects at the reception of the building. We process the name and phone number of the person who finds the object for 30 (*thirty*) days from dropping of the object. After this period we re-examine the measures taken with regards to the lost and found object. If the owner or user of the object has not come forward and our company could not manage to track down the owner based on the available information, the object and the personal data of the person who found the object are destroyed while a formal report is made of this event.

Our company uses the building operation management software Pana-Tech developed and maintained by **Pana-Tech Korlátolt Felelősségű Társaság** (*registered seat: 1135 Budapest, Jász utca 74.; tax ID: 14585548-2-41*) as per the instruction of the data controller TopTorony Zrt.

Our company has assessed all its data processing activities and processes. If you send us an inquiry, we will promptly inform you whether we process your personal data as a data processor in the name of a data controller.

You may find additional detailed descriptions of the data processing activities of the Bank Center in the ownership of TopTorony Zrt. under the following link:

<https://www.bankcenter.hu/hu/adatvedelem>

V. How do we protect your data?

a) **Security**

We take appropriate technical and organizational measures to protect your personal data against loss or other forms of unlawful processing. Our company makes every effort to comply with the best practices of information security.

b) **Confidentiality**

We undertake the obligation of confidentiality with all contractual partners. This confidentiality applies to the personal data processed in relation to the contract between our company and our contractual partner.

VI. What are your rights with regards to our processing of your personal data?

6.1. Information and access to personal data

You may request the company in writing to provide information as to:

- a) the personal data processed by our company regarding you, as well as
- b) the legal basis of the processing,
- c) the purpose of the processing,
- d) from which source the personal data originate,
- e) the duration of the processing,
- f) to whom our company forwards the personal data and its legal basis.

We shall comply with your request within 15 (*fifteen*) days by electronic or postal mail to the address you provided. Prior to complying with the request our company may ask you to further specify the request or the data processing activities.

If your right to obtain information as described above adversely affects the rights and freedoms of others (*especially regarding trade secrets and intellectual property rights*) we are entitled to refuse to comply with the request in the necessary and proportionate amount.

In the event you request the above information in multiple copies, our company is entitled to bill a proportionate and reasonable amount of money in connection with the administrative costs of fulfilling the request. If the personal data indicated by you is not processed by us, we shall nevertheless inform you of this fact.

6.2. Right to rectification

You shall have the right to obtain from our company without undue delay the rectification of inaccurate, incorrect or incomplete personal data concerning you. We shall correct the inaccurate or incomplete data immediately, but no later than within 5 (*five*) days. If it does not conflict with the purposes of the processing, we may complete the incomplete personal data by means of a supplementary statement provided by you. We shall notify you of the above by electronic or postal mail to the address you provided.

Our company shall be exempted from complying with the request for rectification if

- a) the accurate, correct and complete personal data are not available and you do not provide those to us, or
- b) if the validity of the personal data provided by you cannot be established.

6.3. Right to erasure („right to be forgotten”)

You shall have the right to request from us the erasure of any personal data relating to the data subject. You shall make the request in writing with specifying the personal data to be erased and the reason for the erasure.

The fulfilment of the request shall only be denied by our company in case the processing of the personal data is obligatory for us by law. Should we not be obligated by law to process the personal data then we shall comply with the request no later than within 15 (*fifteen*) days and inform you by electronic or postal mail to the address you provided.

6.4. Right to restriction of processing

You may request our company the restriction of processing the personal data in writing. The restriction shall apply until the reasons you specified make it necessary. You may request the restriction of processing if:

- the accuracy of the personal data is contested by you (*for a period enabling the controller to verify the accuracy of the personal data*);
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- you have objected to processing pending the verification whether the legitimate grounds of us as the controller override those of you as the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, 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 reasons of important public interest of the Union or of a Member State.

If you have obtained restriction of processing, you shall be informed by our company before the restriction of processing is lifted.

After complying with the request of restriction our company shall inform of that fact any persons or legal entities to whom we have lawfully forwarded your personal data, unless such a task is impossible or would require unproportionate effort from our company.

6.5. Right to an effective remedy

6.5.1. Dispute resolution with the Company

You may announce your request regarding information, rectification, erasure and restriction in person or in writing at any addresses of our company provided in Section I.

6.5.2. Right to complaint

In the event the dispute resolution with us proved unsuccessful or you deem that your rights listed above were violated or a direct risk of such violation exists, you are entitled to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information.

Contact information of the Hungarian National Authority for Data Protection and Freedom of Information (*Nemzeti Adatvédelmi és Információszabadság Hatóság*)

Registered seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Mailing address: 1530 Budapest, Pf. 5

Telephone: +36(1)3911400

Telefax: +36(1)3911410

E-mail address: ugyfelszolgalat@naih.hu

Website: <http://naih.hu>

6.5.3. Right to a court

You – *regardless of your right to complaint* – may file an action with the courts if your rights under the GDPR and the Privacy Act have been violated.

Any action against our company may only be filed with a Hungarian court.

You may file the action with the court of your jurisdiction. The Courts of Hungary and their jurisdiction are available at the following link: <http://birosag.hu/torvenyszekek>

The legislation referenced in this privacy policy:

- a) **GDPR:** REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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*)
- b) **Privacy Act:** Act CXII of 2011 on Informational Self-Determination and Freedom of Information
- c) **Accounting Act:** Act C of 2000 on Accounting
- d) **Business Advertising Activity Act:** Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activity
- e) **E-Privacy Directive:** Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector
- f) **Security Services Act:** Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators