

BACEE Kft's Data Protection Policy

1. Introduction

The purpose of this policy is to set out the approach of BACEE Kft. (the "Company") to the protection of Personal Data.

This policy applies to all consultants, contractors and temporary personnel engaged by the Company, including any other parties that may obtain, use, create or maintain Company data.

2. Context

2.1 Scope

The Company collects and uses Personal Data about its partners and other individuals who come in contact with it (referred to as Data Subjects), in the execution of its business activities. In collecting and using Personal Data, the Company is committed to respecting the rights of these Data Subjects in relation to the processing of their Personal Data, and to complying with all applicable laws and regulations.

This Policy relates to the Company's activities when it is acting as a Data Controller or as a Data Processor as defined in the EU General Data Protection Regulation or local equivalent legislation.

This policy supplements any other policies of the Company relating to information security and data retention.

The Company may supplement and amend this policy by additional policies and guidelines from time to time.

2.2 Applicable rules, laws and regulations

The Company is subject to the rules, regulation and laws of a number of jurisdictions, including, but not limited to:

EU Directive 2002/58/ EC.

Local Hungarian legislation relating to data protection

EU GDPR 2016/679

3. Obligations and Requirements

3.1 Responsibility

The policy of the Company is to process Personal Data in accordance with the applicable data protection laws and regulations, to protect the rights and freedoms of an individual.

3.2 Principles

The Company will observe the following principles in respect of the processing of Personal Data:

Process Personal Data fairly and lawfully in line with the individuals' rights;

Ensure that the reasons for processing Personal Data are adequate, relevant and not excessive for that purpose;

Ensure that Personal Data is kept up to date where necessary;

Ensure that Personal Data is kept only for as long as it is needed;

Ensure that Personal Data is protected from loss or misuse

Ensure that Personal Data is adequately protected when transferred across national borders and/or shared with 3rd parties.

3.3 Fair and Lawful Processing

The Company will process Personal Data fairly and lawfully and will do so in the following circumstances:

The processing is necessary to satisfy a legal obligation of the Company;

The processing is in the legitimate interests of the Company and does not unduly prejudice the privacy of an individual;

Processing is necessary to fulfil the requirements of a contract with a Data Subject;

The Data Subject in question has consented to the processing of their Personal Data.

3.4 Purpose of Processing

In broad terms, the Company will collect and process personal data for the following purposes:

To meet its legal obligations.

To satisfy the legitimate interests of the Company in meeting its objectives and to provide sound governance and operational controls.

To meet the contractual obligations of the Company.

The Data Subject's rights are protected by law. A Data Subject may request erasure, object or otherwise make representations to the Company, which the Company will act on in accordance with its legal obligations.

3.5 Accuracy, adequacy, relevance and proportionality

Personal Data must be processed in a way that is accurate, adequate, relevant, and proportionate for the purpose for which it was obtained.

Personal Data obtained for one reason may not be used for any other purpose not directly connected to the original reason for its collection and processing (unless the individual in question has explicitly agreed to this additional processing, or, would otherwise reasonably expect that their data may be used in this way).

The Company must ensure that Personal Data held by the Company is accurate and updated as required. If the Personal Data or circumstances of an individual change, this merits at least a review of the Personal Data held by the Company.

All proposed changes to the processing of Personal Data will be considered so as to ensure that the proposed processing changes do not expose the Company to non-compliance or possible data breach risks.

3.6 Data retention

Personal Data must not be retained for any longer than is necessary to satisfy the fair and lawful reason for processing it.

3.7 Classification, Handling & Data Breach Reporting

The Company will classify and handle Personal Data in a manner, which is consistent with this policy and all applicable law. It will investigate any breach of its obligations and take appropriate remedial actions; and make any applicable notifications.

3.8 Transfers

Personal Data can only be transferred in appropriate circumstances.

The Company may choose to utilize the services of a Data Processor and where it does so it must ensure suitable steps are taken to protect the Personal Data it has collected as a Controller. A Controller remains responsible for all aspects of the data collected on its behalf.

3.9 Rights of individuals

Data Subjects are entitled to send their inquiries related to the handling of their personal data in writing to the Company by post, or by email to istvan.lengyel@bacee.com. Data Subjects are entitled to file a complaint or (submit a request for) a legal remedy regarding data processing with the Hungarian National Authority for Data Protection and Freedom of Information or a court.

According to articles 12-21 of the General Data Protection Regulation, Data Subjects are entitled to request the Company, as the Data Controller, to access, correct, delete or restrict the processing of their personal data and to object to the processing of such personal data in person, in written form by mail (H-1013 Budapest, Feszty Árpád utca 2.), by phone (+361 212 62 10) or by email (istvan.lengyel@bacee.com).

In the event of a breach of the Data Subject's rights under the General Data Protection Regulation, Data Subjects are entitled to lodge a complaint with the Data Controller at the contact details provided above.

Data Subjects are also entitled to file a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1055 Budapest, Falk Miksa utca 9-11; Postal address: 1374 Budapest, Pf. 603.; Phone: +36 (30) 683-5969; +36 (30) 549-6838

E-mail: ugyfelszolgalat@naih.hu).