

## Data Protection (GDPR) Policy

### Details of the data controller

Name of the data controller: Globomax Zrt. (GLOBOMAX ZRT.)

Registered seat of the data controller: H-1155 Budapest, Wysocki utca 1.

Data controller's contact details, electronic mailing address regularly used for communication with the users: info@globomax.hu

Registration number: 01-10-047166

Tax number: 23504550-2-42

Name of registering authority: Budapest-Capital Regional Court

Phone numbers: +36 1 306 5371

Language: English

The Data Controller shall keep its records, carry out its statistical data collection, data processing and information provision activity, and process the personal data coming into its possession in line with the legal provisions and EU regulations applicable to it, effective at any given time, in accordance with the provisions thereof. In the course of its controlling and processing activity, the Data Controller shall exercise particular care to prevent the occurrence of data protection incidents.

Globomax Zrt., hereinafter referred to as *data controller*, shall consider itself bound by the content of this notice, but shall reserve the right to make changes in the notice, provided that it notifies the Data Subjects of such changes in due time.

The data controller considers the respect of its customers' right to informational self-determination as a priority. It shall treat the personal data confidential and shall take all necessary actions to guarantee data security.

Declaration on the contracting party's personal data:

By using the service, I acknowledge that my personal data stored by the Data Controller in the user database corresponding to the <https://globomaxcreation.com> website (which I am obliged to provide upon registration) are the following:

**name,**  
**address,**  
**phone number,**  
**company name,**  
**tax number,**  
**e-mail address.**

### Data processing principles:

Personal data may be processed if

- a) the data subject has given its consent (voluntary), or
- b) it is required for an objective in the public interest by a law (or any other legal provision), or a local government decree on the basis of an authorisation pursuant to the former (mandatory).

Personal data may be transmitted, and the different data processings can be interconnected if the data subject has given his or her consent, or it is permitted by the law, and if the criteria of data processing are fulfilled with respect to each piece of personal data.

Personal data may be processed only for a specific purpose, in order to exercise a specific right and comply with a specific obligation.

Only personal data indispensable for the implementation of the purpose of data processing may be processed, to the extent and for the time adequate and necessary for achieving the given purpose. Voluntary personal data may only be processed with a consent granted based on appropriate information.

The data subject must be informed in a clear, easy-to-understand and detailed manner of each fact relating to the processing of his or her data, including in particular the purpose and the legal basis of data processing, as well as the person entitled to data processing, the duration of data processing, and the persons to whom the data may be disclosed to. The information shall cover the rights and legal remedies of the data subject in connection with data processing.

It is forbidden to use a general and uniform personal identification mark which can be used without restriction.

Regarding the personal data processed:

- a) their recording and processing shall be fair and lawful;
- b) they shall be accurate, complete and, where applicable up-to-date;
- c) the method of their storage shall ensure that the data subject can only be identified for the time necessary for the purpose of storage.

Transmission to the EEA states shall be considered as if the data transmission took place within the territory of Hungary. Personal data may only be transmitted to a data controller or data processor located in a third country if the data subject has given his or her express consent, or if permitted by the law, and the adequate level of protection of the personal data is ensured in the third country during the controlling or the processing of the transmitted data.

### **Scope of the personal data**

Data processing is based on voluntary consent.

We draw the attention of the data providers to the fact that if they provide personal data other than their own, it shall be the obligation of the data provider to obtain the data subject's consent.

The scope of data processed: username, password, surname and first name, e-mail addresses, phone numbers, company name, date and time of registration.

Time limit for deletion of data: ten years from the last login; in case of consents given to the sending of newsletters, the consent shall be valid until withdrawal. We retain accounting documents for 8 years pursuant to Section 169(2) of Act C of 2000 on Accounting. In accordance with the statutory provision, personnel management data originating from an employment relationship or a personal services relationship cannot be culled; in this case, the legal basis of data processing is compliance with a statutory obligation.

### **What are cookies and how do we handle them?**

Cookies are small data files (hereinafter: cookies) which are placed onto your computer via the website when you are using the website, by being saved and stored by your internet browser. The majority of the most frequently used internet browsers (Chrome, Firefox, etc.) accept and authorise the download and use of cookies by default; however, it is up to you whether you reject or disable them by changing the settings of the browser; you can also delete the cookies that have already been stored on your computer. More information on the use of cookies is provided in the "help" menu item of the different browsers.

Provided that data processing starts as soon as you visit the website, you will be informed on the cookies requiring consent and your consent will be requested by the DATA CONTROLLER at the beginning of your first visit.

The DATA CONTROLLER shall not apply or authorise cookies by using which third persons may collect data without your consent.

It is not mandatory to accept the cookies, but the DATA CONTROLLER shall not assume liability if our website fails to function in the expected manner without the cookies being enabled.

### **Customer correspondence of the DATA CONTROLLER**

Should you have any question or problem while using our services, you can contact us by phone or e-mail in matters relating to the service. The data controller shall delete the letters received, including the name and e-mail address of the sending party, as well as any other personal data provided by you, after up to five years from the date on which the issue was settled.

### **Data generated during online registration**

In case of online registration, the data subject shall be the user who registers on our website and provides his or her personal data. It is the responsibility of the user to ensure that only he or she uses services from the e-mail address provided and by using the data provided by him or her. Purpose of data processing:

- Compliance with the obligations set out in the supply contracts, customer identification and ensuring an adequate service quality
- Initiating contact regarding offers, making an offer with a more precise content
- Analysis of website use

Legal basis of data processing: the consent of the data subject which is provided by him or her by acquainting himself or herself with the data processing notice, providing the data subject's data on a voluntary basis, and submitting the registration. Only the members and the staff of the DATA CONTROLLER providing service may view the data provided in the course of online registration.

**Duration of data storage:** 30 days following the active existence of the registration.

### **Other data processing**

Information on data processings not listed in this notice shall be given upon the recording of the data.

### **Method of storing personal data, security of data processing**

Data processing associated with visits to the website: viewing information publicly available to anyone on our website does not require the provision of any personal data. We automatically receive the following data on the visitors of the website: the IP address of the visitor, the date and time of the visit, the pages and content viewed on the website.

These data appear in the Google Analytics service as a result of automatic data transmission. Such data are used by the DATA CONTROLLER to carry out analysis in connection with the website, to check the safe functioning of the website.

The website's IT systems and other places of data retention are located at the registered seat of the data controller's IT service provider.

The Data Controller shall select and operate the IT assets used for the processing of data during the provision of its services in a way that the processed data:

- a) shall be accessible to those eligible (availability);
- b) their authenticity and authentication shall be ensured (authenticity of data processing);
- c) their integrity can be proved (data integrity);
- d) they shall be protected against unauthorised access (confidentiality of the data).

In order to protect the security of data processing, the Data Controller shall take technical, structural and organisational measures which provide a level of protection appropriate to the risks associated with data processing.

During data processing, the Data Controller shall maintain

- a) confidentiality: protects the information so that only those authorised can access it;
- b) integrity: protects the accuracy and completeness of the information and the method of processing;
- c) availability: ensures that the authorised user can actually access the desired information when he or she needs to do so, and that the related means are available.

The IT system and network of the Data Controller are both protected against computer-assisted fraud, spying, sabotage, vandalism, fire and flood, as well as computer viruses, computer intrusions, and denial-of-service attacks. The operator shall ensure security with server-level and application-level security procedures.

We hereby inform our users that the electronic messages transmitted on the internet are – irrespective of the protocol (e-mail, web, ftp, etc.) – vulnerable to network threats which lead to unfair activities, contract dispute, or the disclosure or alteration of the information. The Data Controller shall take all reasonable measures to protect the information from such threats. It shall monitor the systems to record all security derogations and to provide evidence in case of each security incident. In addition to the above, system monitoring also allows the verification of the efficiency of the precautions applied.

### **Legal remedies**

The Data Subject may request information on the processing of his or her personal data; furthermore, he or she may request the rectification, or the deletion of his or her personal data, except for data processing required by the law, as indicated upon the recording of data.

At the request of the data subject, the data controller shall give information on the former's data controlled by him or those processed by the data processor assigned by him, the purpose, the legal basis, the duration of data processing, the name, address (registered seat) of the data processor and his activity associated with data processing, as well as on the persons who receive or have received the data and the purpose for which they receive or have received them. The data controller shall provide the information as soon as possible after the submission of the request, but no later than within 30 days, in writing, in an easily understandable form. This information is free-of-charge if the person requesting information has not submitted a request for information to the data controller in the current year concerning the same area. In other cases, the DATA CONTROLLER may determine a remuneration.

The DATA CONTROLLER shall delete the personal data if its processing is unlawful, the data subject requests so, the purpose of data processing has ceased, the time limit of the retention of the data under the law has expired, or the court or the National Authority for Data Protection and Freedom of Information has required the deletion.

The DATA CONTROLLER shall notify the data subject, as well as all persons to whom the data has been transmitted for the purpose of data processing on the rectification and the deletion of the data. The notification shall be omitted if non-notification is not contrary to the legitimate interest of the data subject with respect to the purpose of data processing.

The data subject may object to the processing of his or her personal data if

- a) the processing (transmission) of personal data is only necessary for the enforcement of the legitimate right or the legitimate interest of the data controller or the data importer, except if the data processing has been required by the law;
- b) the personal data are used or transmitted for the purpose of direct marketing, opinion polling, or scientific research;
- c) the exercise of the right to object is otherwise permitted by the law.

The Data Controller shall – by simultaneously suspending the data processing – investigate the objection as soon as possible after the submission of the request, but within up to 15 days, and inform the requesting party on the results of the investigation in writing. If the objection is justified, the data controller shall cease the data processing – including any further data recording and data transmission –, block the data, and notify those to whom it has previously transmitted the personal data concerned by the objection and who are obliged to take measures in order to enforce the right of objection on the measures taken on the basis of the objection.

If the data subject disagrees with the decision made by the data controller, he or she may apply to the court against the decision within 30 days from being notified of the decision.

The Data Controller may not delete the data of the data subject if the data processing has been required by the law. The data cannot, however, be transmitted to the data importer if the data controller has agreed with the objection, or the court has established the legitimacy of the objection.

The data subject may apply to the court against the data controller in case of the infringement of his or her rights. The court shall act in such cases with priority.

Appeals and complaints may be submitted to the National Authority for Data Protection and Freedom of Information:

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

Postal address: H-1530 Budapest, Pf.: 5.

Phone: +36 (1)391-1400

URL:

<https://naih.hu>

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

Budapest, 30 June 2021