

Privacy policy and data management information sheet of ELMA Layers Kft., Hungary

Aim and scope of the policy

This information sheet aims to describe the terms of information protection and management principles and the policy ELMA Layers Kft., Hungary -hereinafter as Data Controller- binds to and acknowledges as obligatory. The Data Controller retain full responsibility to comply with all requirements described by the present policy, the applicable national legislation and the legal acts accepted by the EU concerning all data management processes.

The Data Controller is committed to protect partner and customer data; therefore, the Data Controller manages the collected information as confidential and shall apply all security, technical and organisational measures to guarantee data safety.

The present information sheet describes the terms applicable for personal data provided by users and cookie policy of webpage <http://www.elmalayers.com>. The information sheet was created with regard to the terms of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), and of the Act CXII of 2011 ("Privacy Act") as well as of the Act V. of 2013 (Hungarian Civil Code).

Data Controller information

ELMA Layers Kft. (Headquarter: 2943, Bábolna, Ácsi út 6.; Company reg.n.: 11-9-027202; VAT number: 27055663-2-11; Tel.: 06 30 348 3143; E-mail: info@elmalayers.com)

Data Processor information

The following Data Processing agent provides service to the Data Controller concerning the management of personal data through website development, management and maintenance:

FOXBIT Kft. (Headquarter: 2943 Bábolna, Móra Ferenc utca 42.; Company reg.n.: 11-09-010615; VAT number: 13434834-2-11; Tel.: 06 20 54 24 150; E-mail: info@foxbit.hu)

Definitions

data subject: an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to a personal data.

personal data: means any information relating to the data subject – including conclusions deduced from this information - such as a name, an identification number, one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.

data set: the overall of data registered in one filing system.

data controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means (including the equipment used for this purpose) of the processing of personal data carried out by the data controller or by a 'processor'.

data processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller as per contract and legal directives.

data processing: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by

transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction as well as the prevention of further use.

data management: is the overall of technical tasks linked to 'data processing', independent of the applied method and equipment as well as of the location of the application in case the technical task is performed upon the data itself.

data transmission: disclosure of data to a specified third-party.

consent: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

objection: statement of the data subject disapproving the processing of his/her personal data and requesting the cancellation of data processing and the deletion of personal data.

public disclosure: disclosing the data to the public.

data erasure: destruction of data by any means that makes data restoration impossible.

data designation: labelling of data with an identifier in order to differentiate it.

restriction of processing: means the marking of stored personal data with the aim of limiting their processing in the future permanently or for a limited period of time.

data destruction: the complete destruction of the physical data storage medium.

personal data breach: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

third party: means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

information sheet: the present sheet published by the Data Controller.

Personal data management policy

Personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing – under act 89, paragraph (1) – for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods – under act 89, paragraph (1) –, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

The Data Controller is responsible to comply with all requirements described above and must be able to prove compliance (accountability).

Personal data processed

- I. Data Controller processes following data provided by user via the website:
 - name
 - e-mail address
- II. Cookie management:

Essential cookies: The Data Collector places a small piece of data (so called 'cookie') on the User's computer to be able to provide customisable service. The aim of the cookie is to ensure the highest possible quality of function, customised services and to increase user satisfaction. The user is able to delete the cookies from his/her own computer and is able to configure browser to block cookies. By blocking cookies the User must acknowledge that the website will not be fully operational.

Functionality cookies: These cookies allow the website to remember information the user provides (such as department choice) in order to provide enhanced, more personal features. The information these cookies collect and store is anonym and these cookies cannot track the User's browsing activity on other websites. The User can set the browser to block cookies by rule and/or to set to browser to ask for permission each time to allow cookies or not. The User is able to delete all cookies that have been re-enabled. The Data Subject can find detailed information on cookie settings in the 'Help' menu of the browser. Disabling all cookies by rule might block some functionalities of the website.

Purpose of data processing

Getting in contact with user, handling and management of user requests, setting up of business relationships.

Legal base of data processing

The data processing on the Data Controller's website is based on voluntary contribution. In the case of voluntary contribution Data subjects may cancel data processing permission at any time.

Authorized persons to access the data

The person in charge of the Data Controller's product sectors and the employees of MiniCRM Ltd., which has a contractual relationship with the Data Controller, who handle inquiries made on web, as well as the Data Processor's employee, who is responsible for website maintenance.

Principles and methods of data management

The Data Controller shall process all personal data in accordance with the principles of good faith, fairness and transparency, as well as applicable law and the provisions of this information sheet. The Data Controller shall only use personal data indispensable for the provision of requested services, subject to the consent of the User concerned and solely for the purpose for which it was provided. The Data Controller shall only process personal data for the purposes described in this information sheet as well as for the purposes specified in the applicable legislation. The scope of personal data processed is proportionate to the purposes of the Data Processing and may not extend beyond that. In case the Data Controller intends to use the Personal Data for purposes other than the purpose for which they were originally collected, the Data Controller is obliged to inform the User thereof and shall obtain the Data Subject's prior express consent and must provide the possibility to prohibit such use.

The Controller does not verify the provided Personal Data. Solely the person providing the Personal Data is responsible for its accuracy. The personal data of a person under the age of 16 may be processed only with the consent of a person of legal age or parental control. The Data Controller is not in a position to verify the authorization of the contributor or the content of his / her statement, so the User or any person exercising parental control over it assures that the consent complies with the law. In the absence of consent, the Data Controller will not collect Personal Data relating to any data subject under the age of 16.

The Data Controller will not transfer the Personal Data it handles to any third party other than the Data Processor specified in this information sheet.

The Data Controller will ensure the security of the Personal Data, by taking the technical and organizational measures and procedures to ensure that the data recorded, stored or processed are protected, and prevent their accidental loss, unauthorized destruction, unauthorized access, unauthorized use and unauthorized alteration or distribution.

Subject to the relevant provisions of the GDPR, the Data Controller is not obliged to designate a Data Protection Officer.

Duration of data management

Data processing of personal data provided by User during first contact will last until the purpose of data processing exists (business relationship) or until the User withdraws permission.

Rights of the data subject

The right to be informed – The Data Controller takes all needed measures to provide all information – under paragraphs 13 and 14 of GDPR as well as under articles 15-22 and 34 – to Data Subjects relating data processing in a concise, clear, easily understandable and accessible way.

The right of access - The Data subject has the right to receive feedback from the controller that his or her personal data is being processed and, if so, to access to the personal data and the following information: purposes; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be communicated, including in particular third-country recipients or international organizations; the envisaged period for which the personal data will be stored; the right to rectification, erasure or restriction of data management and the right to object; the right to lodge a complaint to the supervisory authority; information on data sources; the fact of automated decision making, including profiling; and clear information on the logic used and the significance and likely consequences for the data subject of such processing. The Data Controller must provide the information within a maximum of one month from the submission of the request.

The right to rectification - The Data Subject may request the rectification of inaccurate personal data managed by the Data Controller and the completion of incomplete data.

The right to erasure - The Data Subject has the right, upon request, to have all personal data relating to him/her deleted without undue delay on any of the following basis:

- if personal data are no longer necessary for the purpose for which they were collected or otherwise processed;
- if the data subject objects to the processing and there is no overriding legitimate reason for the processing;
- if personal data have been unlawfully processed;

The right to restrict processing - At the request of the Data Subject, the Data Controller restricts data management if any of the following conditions are met:

- the person concerned contests the accuracy of the personal data, in which case the limitation relates to the period during which the accuracy of the personal data can be verified;
- the processing is unlawful and the data subject opposes to the erasure of the data and instead requests that their use be restricted;
- the data controller no longer needs personal data for the purposes of data processing, but the Data Subject requires them for the purpose of submitting, enforcing or defending legal claims;

The right to data portability - The Data Subject has the right to retrieve the personal data relating to him or her which he or she has made available to the Data Controller in a widely used, machinereadable format and to pass this data on to another Data Controller.

The right to object to processing - The Data Subject has the right to object to the processing of his or her personal data in the public interest or in the exercise of public authority delegated to the controller, or to the processing of such data; and profiling based on his/her situation at any time. In the event of a protest, the Data Controller cannot further process the personal data unless it is justified by overriding legitimate reasons relating to the interests, rights and freedoms of the data subject or to the filing, enforcement or protection of legal claims.

The right to withdraw permission - The data subject has the right to withdraw his or her consent at any time.

Law enforcement possibilities

- Please feel free to contact any contact person under 'Contcats' tab on Data Controller's website regarding your questions or comments relating to data management.
- The User may directly contact the National Authority for the Privacy and Freedom of Information with his/her data protection complaint (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c; phone: +36 1 3911400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu).
- If User's rights are violated, user can seise the court. Details of the court: District Court of Komárom; Address: Komárom, Beöthy Zsolt u. 26, 2900 Created at Bábolna, 15/08/2019.