

Privacy Policy

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I. General information

1. The name, address and contact information of the Controller (hereinafter: the Company)

Company name: Szinorg Universal Vagyonkezelő Zártkörűen Működő Részvénytársaság

Registered seat: 4025 Debrecen, Simonffy Street 34-36.

Authorised representative: Gyula Szűcs, president of the Board of Directors

Company registration number: 09 10 000503

Tax number: 24670250-2-09

Phone number: +36 52 507 300

E-mail address: info@szinorg.hu

Data protection officer:

- Company name: QUALIMED-IL Fejlesztő Iroda Korlátolt Felelősségű Társaság
- Registered seat / mailing address: 4034 Debrecen, Hold Street 45.
- Tax number: 13023960-2-09
- Represented by Lajos Bernáth, managing director
- Telephone number: 06-20-942-1192
- E-mail address: bernath.lajos@hunep.hu

2. Principles

The purpose of this Privacy Policy is provide Data Subjects with information on the data controlled by the Company and transmitted to its processors, on the name and address of the processor, as well as on the purpose, legal basis and duration of the data controlling and the legal basis of the data transmission.

In the course of the controlling of personal data, the Company takes into consideration the following principles:

- Lawfulness, fairness and transparency: Personal data shall be processed lawfully and fairly, in a manner that is transparent to Data Subjects.
- The personal data shall only be collected for specified, explicit and legitimate purposes and shall not be controlled further in a manner that is incompatible with those purposes.
- Accuracy: The personal data are accurate and, if necessary, up-to-date; we make all reasonable efforts to ensure that any personal data that are inaccurate for the purpose of the data controlling be deleted or corrected.
- Storage limitation: Personal data shall be stored in such a way that it makes the identification of the Data Subjects possible only for the duration necessary for the achieving the purpose of the data controlling. The storage of personal data for a longer time may only take place for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, also with a view to the implementation of the appropriate technical and organizational measures prescribed by the GDPR for the protection of the rights and freedoms of the Data Subject;
- Personal data shall be processed in a manner that ensures the integrity and 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;
- Accountability: The Company is responsible for compliance with the principles.

3. The principles applied in the course of the security measures

Taking into account the state of the art in science and technology, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the Company shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident, as well as a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

The Company did not adopt approved codes of conduct or approved GDPR certification mechanisms.

The physical location of data storage is the registered seat of the Company.

II. Data processing

1. Information on the processing of data in the course of the operation of the website

The Company is the operator of the <https://www.szinorg.hu/> website. The purpose of the website is to present the members of the Company's group, their operation, and the real properties in their asset management. Occasionally, the website also presents real properties offered for sale or rent. In case of such real properties, the website also shows the name and company telephone number or company e-mail address of the contact person at the given company within the group. By way of establishing contact via the contact information provided, the Data Subject voluntarily consents to the Company – by way of its designated contact person – getting to know the telephone number or e-mail address of the Data Subject, based on familiarity with the present privacy policy. We only use the information thus becoming available to us in connection with the subject of the contact established, in the interest of performing the request and needs of the Data Subject, and shall delete such information after the last contact, in case no further legal basis for the processing of such personal Information arises, in which case the provisions of a separate privacy policy shall enter into effect.

In the course of such contact, the purpose of the data controlling is the provision of the offer and performance of the request in accordance with the needs of the Data Subject. Legal basis: the consent of the Data Subject in accordance with Article 6 (1) of the GDPR; the duration of the data processing: the last day of the binding offer or cooperation.

At the time of the first visit to the website, the Company asks the visitor to accept the cookies used on the website, on which detailed information is available in the Cookie Policy. By default, the cookies are switched off; however, in the interest of enhancing the visitor's experience, we recommend that they be accepted with by way of the slider switch, after which the colour of the button changes from red to green.

The website only contains our own, internal cookies, which are essential for the operation of the website, and therefore, the website does not store any information on the visitor and does not make any analyses.

The present policy only provides information with respect to the processing of data in connection with the website operated by the Company; information on all other data processing related to the activities of the Company are included in a separate privacy policy and made available to Data Subjects.

2. The rights of the Data Subject

2.1. Right to erasure

The Data Subject may request **the erasure of the personal data without undue delay**, either in person or in writing, by way of sending an e-mail to this effect, if:

- the personal data are no longer necessary in relation to the purposes for which they were controlled by the Company;
- the Data Subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- the Data Subject objects to the processing, and there are no overriding legitimate grounds for the data processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Company is subject;
- the personal data have been collected in relation to the offer of information society services referred.

The Company shall not erase such information that it is required to retain due to a requirement of law.

2.2. The right to information

The Data Subject may **request information** from the Company, in person or in writing, concerning the processing of his or her personal data, the manner of the data processing, the blocking or erasure of information, as well as any measure in connection with the information processed. The Data Subject may request from the Company at any time to inspect his or her own data.

2.3. Right of feedback

The Data Subject shall have the right to **receive feedback** from the Company 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:

- the purposes of the processing;
- the categories of personal data concerned;
- 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 organisations;
- the proposed duration of the data controlling, or when it is not possible to provide, the criteria for the determination of such duration;
- 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;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the Data Subject, any available information as to their source.

2.4. Right of access by the Data Subject

The Company shall make available to the Data Subject his or her personal data constituting the subject of data processing, by way of a confirmation e-mail sent in response a request.

2.5. Right to rectification

The Data Subject shall have the right to initiate a rectification of his or her data processed by the Company at any time.

2.6. Right to restriction of processing

The Data Subject shall have the right to obtain from the Company restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the Data Subject, for a period enabling the Company to verify the accuracy of the personal data;
- the processing is unlawful, and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data Subject has objected to processing, pending the verification whether the legitimate grounds of the Company override those of the Data Subject.

Where processing is restricted, such personal data shall, with the exception of storage, only be controlled with the Data Subject's 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.

The 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.

2.7. Right to objection

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, to the processing of his or her personal data at any time.

- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company; or
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data.

In this case, the Company may no longer process the personal data unless the it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

The personal data provided for the Company by the Data Subject may only be processed for any purpose other than the original purpose for which it was collected in case the processing is reconcilable with the original purpose of the processing.

The Data Subject may request the rectification or erasure of his or her personal data, or object to the processing of the same, by way of sending an electronic mail to the central e-mail address of the Company. The Company shall, without undue delay, but in any case, within one month, shall reply to the Data Subject and comply with his or her request, provided that it is in line with the statutory rights of the Data Subject.

The Company hereby informs the Data Subject that the data processed shall not be used for profiling or automated decision-making.

2.8. Right to data portability

The Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, without the Company preventing this in case the processing is based on the consent of the Data Subject or a contract, and the processing takes place in an automated manner. The Data Subject may ask the Company to transmit his or her personal data directly to another controller. The Data Subject shall not have the above right, however, if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, and further, this right may not shall not adversely affect the rights and freedoms of others.

3. Data transmission

The Company does not transmit any data in connection with the website operated by it.

4. The handling of personal data breaches

A personal data breach is 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.

As soon as the Company becomes aware that a personal data breach has occurred, it shall the supervisory authority without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless the Company is able to demonstrate, in accordance with the accountability principle, that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

The Company shall inform the Data Subject when becoming aware of a personal data breach, without undue delay, in case it is likely to result in a high risk to the rights and freedoms of the natural person in order to allow him or her to take the necessary precautions. As part of such information, the Company provides a description of the personal data breach, and makes recommendations to the Data Subjects with the aim of mitigating any possible adverse effects of the personal data breach.

Upon recognizing the occurrence of a data breach, the Company shall ascertain whether all appropriate technological protection and organisational measures have been implemented to establish immediately whether a personal data breach has taken place and to inform promptly the supervisory authority and the Data Subject. In the interest of the above, the managing director acting on behalf of the Company shall, within 24 hours after finding out about the personal data breach, summon the members, all persons involved in the processing of data, as well as an external IT expert, in order to determine the reasons causing the personal data breach, to elaborate a plan of actions taken and to be taken, as well as to introduce measures to prevent subsequent personal data breaches.

5. Limitations

In case of Data Subjects who are younger than 16 year of age or otherwise do not have legal capacity, their lawful guardian may give consent on their behalf.

6. Records of processing activities

The Company maintains records of its data processing activities.

That records shall contain the following information:

- the name and contact information of the Controller;
- the purposes of the processing;
- a description of the categories of Data Subjects and of the categories of personal data;
- categories of recipients to whom the personal data have been or will be disclosed;
- where possible, the envisaged time limits for erasure of the different categories of data.

III. Available legal remedies

1. The place, time and manner of submitting complaints, available legal remedies

1.1. The place where complaints may be submitted in case of a breach of data protection

The Data Subject may submit his or her complaints in connection with the processing activities of the Company at the following points of contact: Postal address: Szinorg Universal Vagyonkezelő Zártkörűen Működő Részvénytársaság, 4025 Debrecen, Simonffy Street 34-36, e-mail: info@szinorg.hu.

1.2. The manner of managing complaints

In case of a complaint verbally communicated by telephone or the use of another electronic telecommunication service, the Company shall send to the Data Subject, together with its reply to the merits of the complaint, also a copy of the written record of the complaint. In all other cases, the Company shall proceed in accordance with the rules applicable to written complaints. The Company shall assign a unique identifier to all complaints communicated by telephone or the use of another electronic telecommunication service, which is designed to facilitate the subsequent retrieval of the complaint. The Company shall reply to merits of complaints received in writing within 30 days. The date of the measure taken shall be the date of dispatch by mail. In case of rejection of the complaint, the Company shall also inform the Data Subject of the reason for the rejection.

1.3. Available legal remedies

In case of any assumed legal violation related to the handling of personal data, the Data Subject may file a lawsuit with the competent court of law, or the Metropolitan Court of Law in Budapest, or initiate a proceeding to be conducted by the National Authority for Data Protection and Freedom of Information (president: Dr. Attila Péterfalvi, 1024 Budapest, Szilágyi Erzsébet fasor 22/C, [ügyfélszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), +36 1 391-1400, www.naih.hu)

2. Legal disputes

If a legal dispute between the Company and the Data Subject is not settled in the course of negotiations with the Company, the Data Subject may also file a lawsuit at the regionally competent District Court or Court of Law.