

GRABOWSKI KIADÓ PUBLIC LIMITED COMPANY

About data processing related to distributing copies of Trade magazine to subscribers

DATA PROCESSING INFORMATION

1 THE DATA CONTROLLER AND ITS CONTACT ADDRESSES

1.1 Name of Data Controller: GRABOWSKI Kiadó Public Limited Company ('Data Controller' or 'Grabowski')

Registered office: 1037 Budapest, Bécsi út 269.

Postal address: 1037 Budapest, Bécsi út 269.

E-mail address: info@trademagazin.hu

Telephone number: +36 (30) 826-4158

Fax: +36 1 480 1036

Website: www.trademagazin.hu

2 INFORMATION RELATED TO DATA PROCESSING

2.1 DATA PROCESSING RELATED TO SUBSCRIBING TO TRADE MAGAZIN AND TO DISTRIBUTING COPIES TO SUBSCRIBERS

2.1.1 Purpose of data processing: magazine copy distribution in order to meet the obligations contained in the Trade magazine subscription agreement

The Data Controller processes personal data (*name, tax number, delivery address, e-mail address, billing address, position of the Data Subject, name of the company employing the Data Subject*) provided by the identified or identifiable natural person ('Data Subject' or 'Subscriber') who has subscribed to Trade magazin by filling out the subscription form, with the purpose of meeting the contractual obligations, that is to deliver copies of Trade magazin to the subscribers, with the legal basis and for the time period specified below.

2.1.2 Legal basis for data processing: preparation for entering into the subscription agreement, fulfilment of the agreement

By filling out the subscription form and sending it to the Data Controller, and by accepting the General Terms and Conditions (ÁSZF) provided by the Data Controller to the Data subject, the Data Subject and the Data Controller enter into a subscription agreement ('Agreement') that falls under the scope of *Act 108 of 2001 on Electronic Commercial Services and on Certain Legal Aspects of Information Society Services*, according to which the Data Controller is obliged to provide the Data Subject with

copies of Trade magazin and the Data Subject is obliged to pay the charge specified by the Data Controller.

The processing of personal data provided to the Data Controller by filling out the subscription form is needed for the preparation to enter into the Agreement and for meeting the contractual obligations.

With regard to the fact that without providing the personal data mentioned above the Data Controller is unable to do the preparations for entering into the Agreement and to fulfil the Agreement, the Data Subject is obliged to make the personal data available to the Data Controller. In the case that the Data Subject fails to provide these data, the Data Controller shall have the right to refuse entering into the Agreement with the Data Subject and meeting the contractual obligations.

Therefore the legal basis for the data processing described above is the preparation for entering into the Agreement and the fulfilment of the Agreement.

2.1.3 Time period of data processing: Time period of preparation for entering into the subscription agreement / Term of the contract

The time period of data processing is the same as the time period of preparation for entering into the Agreement, and if the parties enter into the agreement the time period is the same as the term of the Agreement.

In the case that the parties do not enter into an agreement or if the Agreement is terminated, the Data Controller shall retain the personal data as described in Point 2.1.3 with the purpose, on the legal ground and for the time period specified in Point 2.2.2.

2.2 ENFORCING CLAIMS CONCERNING THE AGREEMENT, DATA PROCESSING PERFORMED AS PROTECTION AGAINST SUCH CLAIMS

2.2.1 Purpose of data processing: retaining information for the purpose of enforcing claims concerning the Agreement and protection against such claims.

The Data Controller processes personal data (*name, tax number, delivery address, e-mail address, billing address, position of the Data Subject, name of the company employing the Data Subject*) provided by the Data Subject in order to practice the rights arising from the Agreement, to enforce claims and demands by the Data Controller, to serve as protection against legal claims and demands concerning the Agreement and brought against the Data Controller, to justify and prove the legal relationship and circumstances that are relevant from a legal perspective, on the legal ground and for the time period specified below.

2.2.2 Legal basis for data processing: for pursuing legitimate interest, and the protection against them as legitimate interest

The legal basis for data processing is the legitimate interest of the Data Controller to achieve the objective described in Point 2.2.1.

2.2.3 Time period of data processing: the limitation of Agreement-related claims

If the parties do not enter into the Agreement or following its termination the personal data of the Data Subject shall be retained by the Data Controller for the time period stipulated by the general limitation rules contained in *Act 5 of 2013 on the Civil Code*,

that is until the limitation period for pursuing claims expires; after this the Data Controller shall erase the personal data.

2.3 DATA PROCESSING RELATED TO ISSUING THE INVOICE FOR PAYING TRADE MAGAZIN'S SUBSCRIPTION FEE

2.3.1 Purpose of data processing: issuing the invoice and meeting the related taxation and accounting legal requirements

If on the invoice for the subscription fee that is to be paid to Trade magazin a natural person is indicated as the buyer of the product, from the personal data provided by the Data Subject by filling out the subscription form the Data Controller shall process the *name and address* of the Data Subject, with the purpose of issuing an invoice for the payment of the subscription fee and for meeting the obligations of the related taxation and accounting legal requirements by the Data Controller, on the legal basis and for the time period specified below.

2.3.2 Legal basis for data processing: meeting the taxation and accounting legal requirements related to issuing the invoice

The Data Controller shall retain the Data Subject's data referred to in Point 2.3.1 in order to fulfil the obligation of document preservation as stipulated by the relevant taxation and accounting laws.

With regard to the fact that data processing as described in Point 2.3.2 is a legal obligation of the Data Controller, the failure to provide data may entail the refusal of entering into the Agreement and of meeting the contractual obligations.

2.3.3 Time period of data processing: the longest document preservation period specified in the related taxation and accounting laws

The data processing period of the data processing described above is the same as the longest document preservation period specified by the relevant taxation and accounting laws.

2.4 RECIPIENTS OF PERSONAL DATA

The Data Controller discloses the personal data of the Data Subject to the following persons and organisations, and the following persons and organisations have access to the personal data of the Data Subject:

- *Grand Kereskedelmi és Szolgáltató Kft.* (1034 Budapest, Bécsi út 120., Cg. 01-09-161963) data processor – the company provides and operates the server for storing distribution data as commissioned by the Data Controller.
- *Trans Europe Post Kft.* (1211 Budapest, Petróleum u. 2.; Cg. 01-09-205006) data processor – the company distributes Trade magazin to the subscribers as commissioned by the Data Controller.

When personal data is transmitted to the data processors mentioned above, the Data Controller transfers no data of the Data Subject to third countries located outside of the European Economic Area.

The Data Controller does not transfer the personal data to any other address than the ones specified above; the only exception is if it is obliged by law, any authority or court to do so.

3 RIGHTS OF DATA SUBJECTS

3.1 General provisions for Data Subjects practicing their rights

If the Data Subject makes any of the requests listed in Points 3.2-3.7, the Data Controller shall fulfil that request within a month of receiving the Data Subject's request.

Taking into consideration how complex the request is, the number of requests and the quantity of personal data managed by the Data Controller, the Data Controller is entitled to extend the above deadline with two months. The Data Controller shall inform the Data Subject about extending the deadline in writing, within a month of receiving the request.

If the Data Controller refuses to fulfil the Data Subject's request, it shall inform the Data Subject about this fact and give an explanation within a month of receiving the Data Subject's request. In addition to this, in the information it provides, the Data Controller shall also call the attention of the Data Subject to their right to file a complaint about the Data Controller's decision at the National Authority for Data Protection and the Freedom of Information ('NAIH'), or go to court about the infringement of their right to access.

The Data Controller shall inform the Data Subject that if it has a reasonable doubt about the identity of the person who has made the request, the Data Controller is entitled to ask for more information in order to make sure that the Data Subject can be identified.

If the Data Controller can prove that it is unable to identify the Data Subject, the Data Controller has the right not to fulfil the request of the Data Subject.

The Data Controller shall fulfil the request of the Data Subject free of charge. However, the Data Controller – with regard to administrative costs incurring from the performance of the task requested – is entitled to charge a reasonable sum if the Data Subject's request is unfounded or exaggerated.

What is more, the Data Controller shall also inform the Data Subject in writing about the steps taken upon the latter's request – with the exception of the case described in the next paragraph – unless the Data Subject declares that they do not wish to receive such notifications.

If the Data Subject has made their request electronically, the Data Controller shall provide the information about the steps it has taken in electronic format.

3.2 Right of access by the Data Subject

Upon request from the Data Subject, the Data Controller shall provide information about whether it processes the personal data of the Data Subject and if yes, it shall give access to the processed personal data to the Data Subject, plus make the following information available to the Data Subject in connection with the data:

- a) the purposes of the processing;
- b) the categories of the personal data concerned;
- c) the recipients or categories of recipients to whom the Data Controller have disclosed or will disclose the personal data of the Data Subject;
- d) the envisaged period for which the personal data will be stored or if this is not possible, the criteria used to determine this period;

- e) the existence of the Data Subject's right to request from the Data Controller rectification or erasure of the personal data or restriction of the processing of personal data, and the Data Subject is also entitled to object personal data processing;
- f) in accordance with Point 3.8 of this Data Processing Information, the Data Subject has the right to file a complaint at the National Authority for Data Protection and the Freedom of Information;
- g) as regards data provided not by the Data Subject information on the source of the personal data.

Upon request from the Data Subject, the Data Controller shall provide them with a copy of the personal data undergoing processing.

For any further copies requested by the Data Subject the Data Controller may charge a reasonable fee based on administrative costs.

If the Data Subject's right of access specified by Point 3.2 adversely affects the rights and freedoms of others, and especially the business secrets or intellectual property of others, the Data Controller is entitled to refuse fulfilling the request of the Data Subject to the extent that is necessary and proportionate.

Before its fulfilment, the Data Controller has the right to ask the Data Subject to specify the contents of the request more precisely, to clearly define what information they need and to name the data processing activities in question.

3.3 Right to rectification

Upon the request of the Data Subject, the Data Controller without undue delay shall rectify inaccurate personal or complete incomplete data concerning them .

Having fulfilled the request of the Data Subject to rectify inaccurate personal data, without any delay the Data Controller shall inform those persons to whom it disclosed the personal data of the Data Subject, on condition that it is not impossible to do so or it does not require unreasonable efforts from the Data Controller.

3.4 Right to erasure ('right to be forgotten')

The Data Subject has the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay when one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the Data Subject withdraws consent on which the processing is based, on the condition that the Data Controller has no other legal ground for the processing;
- c) in accordance with Point 3.7 of the Data Processing Information objects to the data processing and there is no prioritised legal reason for data processing;
- d) the Data Controller processed the personal data of the Data Subject unlawfully; or
- e) the personal data have to be erased for compliance with a legal obligation in European Union or Hungarian law.

If the Data Controller disclosed the personal data of the Data Subject to others, having fulfilled the request of the Data Subject to erase the personal data, it shall take

reasonable steps without delay to inform those to whom it disclosed the personal data about the Data Subject's request for erasure, in the case that this is not impossible or requires no disproportionate effort from the Data Controller.

The Data Controller is not obliged to erase the personal data if data processing is necessary for:

- a) the right of freedom of expression and information;
- b) compliance with a legal obligation which requires processing personal data by European Union or Hungarian law to which the Data Controller is subject;
- c) the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- d) reasons of public interest in the area of public health;
- e) purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right of the Data Subject to be forgotten is likely to render impossible or seriously impair the achievement of the objectives of the data processing;
- f) the establishment, exercise or defence of legal claims.

3.5 Right to restriction of processing

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

- a) the Data Subject contests the accuracy of the personal data, for a period enabling the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to the data processing as it is contained in Point 3.7; in this case the restriction refers to the time period when it is decided whether the legitimate claims of the Data Controller shall be given priority or not against the legitimate claims of the Data Subject.

Despite the request for the restriction of processing, the Data Controller shall have the right to store and process the personal data of the Data Subject if:

- a) the Data Subject has given their consent;
- b) it is required for the establishment, exercise or defence of legal claims;
- c) it is needed for the protection of the rights of another natural or legal person; or
- d) it is necessary for reasons of important public interest of the European Union or of a member state.

Both the Data Controller and the Data Subject shall inform one another without delay about the fact that the reason for restricting data processing has ceased to exist. Following the termination of the reason, the Data Controller informs the data subject about lifting the restriction on data processing in advance.

Having fulfilled the request of the Data Subject for the restriction of data processing, the Data Controller instantly informs those persons to whom it disclosed the personal

data, in so far as it is not impossible or requires no unreasonable effort from the Data Controller.

3.6 Right to data portability

The Data Subject shall have the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format.

Where technically feasible, the Data Controller is obliged to transmit the personal data of the Data Subject directly to another Data Controller designated by the Data Subject. However, the right to data portability described in Point 3.6 shall not create an obligation for data processors to introduce or operate data processing systems that are compatible with one another.

In the case that the right to data portability of the Data Subject harms the rights and freedoms of others, especially the business secrets or intellectual property of others, the Data Controller is entitled to refuse fulfilling the Data Subject's request to the necessary extent.

3.7 Right to object

On grounds relating to their particular situation, the Data Subject shall have the right to object to the processing of personal data.

The Data Controller shall no longer process the personal data unless it can demonstrate that there are compelling legitimate grounds for the processing which overrides the interests, rights and freedoms of the Data Subject, or for the establishment, exercise or defence of legal claims.

Where the Data Subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

3.8 Right to lodge a complaint and right to an effective judicial remedy

If the Data Subject considers that the processing of their personal data infringed the regulations in effect, they shall have the right to lodge a complaint with the National Authority for Data Protection and the Freedom of Information ('**NAIH**'); the Data Subject shall also have the right to lodge a complaint with the NAIH if in exercising their rights the request they made to or the information they gave to the Data Controller is refused, or if what is contained in them is not performed.

Contact addresses of the National Authority for Data Protection and the Freedom of Information:

Website: <http://naih.hu/>;

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c;

Postal address: 1530 Budapest, Pf.: 5.;

Telephone: +36-1-391-1400;

Fax: +36-1-391-1410;

E-mail: ugyfelszolgalat@naih.hu

The Data Subject shall have the right to appeal against NAIH's final decision at court.

Besides what is described above, as part of the court procedure the Data Subject shall have the right to seek judicial remedy from the Data Controller if their rights have been infringed. It is the court's task to pass a ruling on the complaint and the court shall discuss the matter as a priority case. Such proceedings may be started at the court of the Data Subject's place of permanent or temporary residence (court details can be

accessed by clicking on the following link: <http://birosag.hu/torvenyszekek>). It is the Data Controller who shall prove it at court that the data processing was lawful.

Furthermore, the Data Subject is entitled to go to court

- a) if they wish to enforce their rights after the infringement of their rights concerning the processing of their personal data;
- b) if the Data Subject wants to claim damages for the unlawful processing of their personal data or for the infringement of data security provisions; or
- c) if they intend to claim financial compensation for the infringement of their personality rights by the unlawful processing of their personal data or by breaching the data security provisions.

In addition to what is described above, the Data Subject shall have the right to commission a non-profit organisation or association with lodging a complaint on behalf of the Data Subject, acting on behalf of the Data Subject during the court proceedings or the claiming for damages; those non-profit organisations or associations are eligible for performing these tasks which have been established in accordance with the laws of Hungary, and is it is included in their deeds of foundation that it is their objective to serve the public interest, and to ensure the protection of the Data Subjects' rights and freedoms concerning their personal data.

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Budapest, 25 May 2018.

GRABOWSKI Kiadó Kft.