

GRABOWSKI KIADÓ PUBLIC LIMITED COMPANY

DATA PROCESSING INFORMATION

About data processing related to distributing copies of Trade magazine with marketing purposes

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 Purpose of data processing:

The Data Controller processes personal data (*name, delivery address, e-mail address, telephone number, position of the Data Subject, name of the company employing the Data Subject*) provided by the natural persons who receive copies of Trade magazine because of marketing purposes but have not entered into a contractual relationship with the Data Controller (they are not subscribers of Trade magazine; **'Data Subject'** or **'Addressee'**) and have been identified or can be identified, on the legal ground and for the time period specified below.

2.2 Legal basis for data processing: the consent given by the Data Subject

By ticking the box next to the text *'Having read and understood the Data Processing Information, with the conditions contained within I give my consent to my personal data being used for marketing purposes.'* or by giving their consent in person by signing a separate document, the Data Subject voluntarily gives their consent, which is based on unambiguous and detailed information made available in advance, to processing their personal data in compliance with what is contained in Point 2.1 of this Data Processing Information.

Giving consent is voluntary and the Data Subject is entitled to withdraw their consent any time, without any limitation or having to provide any explanation, free of charge, by informing the Data Controller about this decision. The Data Subject can send this consent withdrawal to any of the contact addresses listed in Point 1 of this Data Processing Information.

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Withdrawing their consent has no consequences at all for the Data Subject. However, the consent withdrawal does not affect the lawfulness of the consent-based data processing performed prior to the withdrawal.

2.3 Time period of data processing:

Data processing is performed until the Data Subject informs the Data Controller about withdrawing their consent for processing their personal data.

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 - a the company distributes Trade magazin to the addressees as commissioned by the Data Controller.

When personal data is transmitted to the data processors mentioned above or when they are given access to the personal data, 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 3.2-3.6, 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.

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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 **Hiba! A hivatkozási forrás nem található.** 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.

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) the Data Controller processed the personal data of the Data Subject unlawfully;
- d) 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 exercising 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) archiving 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.

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 lodge a complaint and right to an effective judicial remedy

If the Data Subject considers that the processing of their personal data infringed the

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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.

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