

## PRIVACY NOTICE

### 1.1 IDENTIFICATION AND CONTACT DETAILS OF THE CONTROLLER

Name of the controller: **GRABOWSKI Kiadó Korlátolt Felelősségű Társaság**  
(hereinafter referred to as the "Data Controller")

Head office: **1115 Budapest Bartók Béla út 92-94. B lh. 2/16**

Electronic contact: **www.trademagazin.hu**

Telephone number: **+36 (30) 826-4158**

E-mail address to use for data protection matters: **info@trademagazin.hu**

### 1.2 SCOPE OF DATA PROCESSED, PURPOSE OF DATA PROCESSING, LEGAL BASIS AND RETENTION PERIOD

Scope of data processed	Purpose of data processing	Legal basis for processing	Retention period
If the Participant is a legal person, contact details (name, e-mail address)	Maintaining appropriate contact with the Participant when exercising the rights and obligations under the contract.	Contract performance (or in the case of a representative or contact person of a legal person, the legitimate interest of the Data Controller in the performance of a contract entered into or existing with the legal person partner and in the maintenance of the business relationship)	Contact details of the representative or contact person of a legal person are processed for as long as the data subject is the legal person's representative or contact person of the legal person, provided that the Data Controller is notified of the termination of the legal relationship, and documents (e.g. contracts, invoices) in which this person is indicated, until the end of the period for which the document is to be kept.
If the Participant is a private individual, contact details (name, e-mail address, registered office, tax number)	Performance and registration of the contract with the Participant.	Performance of the contract with the data subject.	Until the expiry of the limitation period for the enforcement of legal claims arising from the contract or, in the case of accounting documents, the period prescribed by law for their safekeeping.
IP address	In the case of a public vote, the casting of the voter's vote, checking that a maximum of three votes per day are cast from the given address.	Legitimate interest	The data will be kept by the Data Controller until the public's choice award has been announced. After this period, the data relating to the voting will be deleted.

The retention period may be affected by the exercise of certain rights of the data subject, in particular the right to erasure, the right to object and the withdrawal of consent to processing.

### 1.3. RECIPIENTS OF PERSONAL DATA, CATEGORIES OF RECIPIENTS

#### Data processors

Name of addressee	Recipient status	Reason for data transfer/transmission/access/ activities with recipient involvement
GRAND Kft. (1034 Budapest, Bécsi út 120. Cg. 01 09 161963)	data processor	The company provides and operates a server for the storage of personal data on behalf of the Data Controller

Hetzner Online GmbH (server hosting) 91710 2 Gunzenhausen, Germany, Industriestr. 25.	data processor	The company provides and operates a server for the storage of personal data on behalf of the Data Controller.
Twilio Sendgrid, 375 Beale street, 3rd floor San Francisco, CA 94105	data processor	The company provides and operates a server for the storage of personal data on behalf of the Data Controller
WebGarden Kft. (1143 Budapest, Stefánia út 16 Cg: 01 09 905976)	data processor	The company provides and operates a server for the storage of personal data on behalf of the Data Controller

#### Independent data controllers

Name of addressee	Recipient status	Reason for data transfer/transmission/access/activities with recipient involvement
Jury members	independent controller	If a member of the jury fulfils their obligation as set out in the Rules of the Game, it cannot be excluded that they will be in possession of personal data related to the competition.
Our legal advisors	independent controller	If we need to provide information to our advisors in connection with a legal claim, it cannot be excluded that this information may include personal data.
Courts, authorities	independent controller	In the event of a judicial or administrative request to this effect, we may be under an obligation to transfer data files containing personal data to the competent court or authority.
Auditors	independent controller	In connection with the audit of our company, we may need to provide documents to our partner performing this service, which may also contain personal data.

The controller shall not transfer personal data to any person other than the above recipients, unless such transfer is required by law.

#### 1.4. SPECIAL DATA MANAGEMENT

The Data Controller does not process any special data of the Participants.

#### 1.5. RIGHTS OF PARTIES CONCERNED

The Data Subject may request from the Data Controller access to, rectification, erasure of, and in certain cases restriction of the processing of personal data relating to them. The Data Subject shall have the right to file a complaint with a supervisory authority and the right to a judicial remedy.

**In the case of processing based on consent, the Data Subject also has the right to withdraw consent at any time, without prejudice to the lawfulness of the processing carried out on the basis of consent prior to the withdrawal.**

##### *A) The right of access*

At any time the Data Subject has the right to request information on whether and how their personal data are processed by the Data Controller, including the purposes of the processing, the recipients to whom the data have been disclosed or the source from which the data were obtained by the Data Controller, the retention period, any rights concerning the processing, as well as information on automated decision-making, profiling and, in case of transfers to third countries or international organisations, information on the safeguards relating thereto. In exercising the right of access, the Data Subject shall also have the right to request a copy of the data and, in the event of an electronic request, the Data Controller shall provide the requested information in electronic form (pdf format),

unless the Data Subject requests otherwise. Where the Data Subject's right of access adversely affects the rights and freedoms of others, in particular the trade secrets or intellectual property of others, the Controller shall be entitled to refuse to comply with the Data Subject's request to the extent necessary and proportionate. In the event that the Data Subject requests the above information in several copies, the Controller shall charge a reasonable fee proportionate to the administrative costs of producing the additional copies.

***B) The right to rectification***

The Data Controller shall correct or complete personal data relating to the Data Subject at the Data Subject's request, if the data and the nature of the processing so permit. If there is doubt about the corrected data, the Data Controller may request the Data Subject to provide the Data Controller with evidence of the corrected data in an appropriate manner, in particular by means of a document. Once the corrected data has been verified, the Data Controller shall not retain the document used for that purpose, nor shall it store it in any form. Where the personal data concerned by this right have been communicated by the Data Controller to other persons (such as the addressee as data processor), the Data Controller shall inform those persons without undue delay after the rectification of the data, provided that this is not impossible or involves a disproportionate effort on the part of the Data Controller. The Data Subject shall be informed of these recipients by the Data Controller upon request.

***C) Right to erasure ("right to be forgotten")***

If the Data Subject requests the erasure of some or all of their personal data, the Data Controller shall erase the data without undue delay if:

- the Data Controller no longer needs the personal data for the purposes for which it was collected or otherwise processed;
- the processing was based on the Data Subject's consent, but the Data Subject has withdrawn that consent and there is no other legal basis for the processing;
- the processing is based on the legitimate interests of the Data Controller or a third party, but the Data Subject has objected to the processing and - except for objections to processing for direct marketing purposes - there is no overriding legitimate ground for the processing;
- the personal data have been unlawfully processed by the Data Controller, or
- to comply with a legal obligation, it is necessary to delete the personal data.

Where the personal data concerned by this right have been communicated by the Data Controller to another person (such as the addressee as Data Processor), the Data Controller shall inform such persons without undue delay after erasure, provided that this is not impossible or involves a disproportionate effort on the part of the Data Controller. The Data Subject shall be informed of these recipients by the Data Controller upon request. The Data Controller is not always obliged to erase personal data, in particular where the processing is necessary for the establishment, exercise or defence of legal claims.

***D) Right to restriction of processing***

The Data Subject may request the restriction of the processing of their personal data in the following cases:

- the Data Subject contests the accuracy of the personal data - in this case the limitation applies for the period of time that allows the Data Controller to verify the accuracy of the personal data;
- the processing is unlawful, but the Data Subject opposes the erasure of the data and instead requests the restriction of their use;
- the Data Controller no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims; or
- the Data Subject has objected to the processing - in which case the restriction applies for the period until it is established whether there are compelling legitimate grounds for overriding the Data Subject's right to object.

Restriction of processing means that the Data Controller does not process the personal data subject to the restriction, except for storage, or only to the extent to which the Data Subject has consented, or, in the absence of such consent, the Data Controller may process data necessary for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the European Union or of a member state of the European Union. The Data Controller shall inform the Data Subject in advance of the lifting of the restriction on processing. Where the Data Controller has communicated the personal data of the Data Subject to whom this right applies to another person (such as the addressee as Data Processor), the Data Controller shall inform such persons of the restriction of processing without undue delay, provided that this is not impossible or involves a disproportionate effort on the part of the Data Controller. The Data Controller shall inform the Data Subject of these recipients upon request.

***E) Right to complain, right to redress***

If the Data Subject considers that the processing of their personal data by the Data Controller violates the provisions

of the data protection legislation in force, in particular the General Data Protection Regulation, they have the right to file a complaint with the National Authority for Data Protection and Freedom of Information ("NAIH"). Contact details of the NAIH:

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

Address: 1055 Budapest, Falk Miksa utca 9-11.

Postal address: 1363 Budapest, Pf.: 9.

Phone: +36-1-391-1400

Fax: +36-1-391-1410

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

The Data Subject also has the right to file a complaint with a supervisory authority established in another EU member state, in particular the one where they have their habitual residence, place of work or place of the alleged infringement.

Irrespective of their right to file a complaint, the Data Subject may also take legal action in the event of a breach of the above rights. In the case of the Data Controller, the competent court is the Metropolitan Court, but the Data Subject may also bring the action before the court of their place of residence. The contact details of the courts in Hungary can be found at the following link: <http://birosag.hu/torvenyszekek>. The Data Subject may also bring the action before the competent court of the European Union member state of their habitual residence, if the Data Subject has their habitual residence in another member state of the European Union. The Data Subject also has the right to take legal action against a legally binding decision of the supervisory authority which is addressed to them. The Data Subject also has the right to judicial remedy if the supervisory authority does not deal with the complaint or does not inform the Data Subject within three months of the procedural developments or the outcome of the complaint filed. The Data Subject may entrust the filing of the complaint on their behalf, the judicial review of the decision of the supervisory authority, the bringing of an action and the exercise of their right to compensation on their behalf to a non-profit organisation or association established in accordance with the law of a member state of the European Union, and whose statutory objectives are to serve the public interest and to protect the rights and freedoms of Data Subjects with regard to personal data.

#### 1.6. OBJECTION

In view of the fact that the Data Controller processes certain data on the basis of legitimate interest, **we expressly and separately draw the attention of the Data Subjects to their right to object to the processing of their personal data**, which they may exercise at any time by means of a written statement to that effect. In this case, the objection of the Data Subjects will be deleted by the Data Controller without undue delay, unless the data are necessary for the protection or enforcement of legal claims or the objection is directed against processing based on compelling legitimate grounds of the Data Controller which override the interests and rights of the Data Subject. This will be considered on an individual basis for each objection.

#### 1.7. TIME LIMIT FOR REPLYING TO THE DATA SUBJECT'S REQUEST

The Data Controller shall ensure that, in the event that the Data Subjects exercise any of their rights in relation to this processing and contact the Data Controller in this regard, the Data Controller shall respond to such requests without undue delay and at the latest within one month, not including in the case of withdrawal of consent, when it shall promptly arrange for the erasure of the data processed on the basis of consent.

If necessary, taking into account the complexity of the application and the number of applications, the time limit set out in the previous paragraph may be extended by a further two months. In such a case, the Data Controller shall inform the Data Subject of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible.

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**Date of effect: 9 January 2023.**