

## Information on data management

The purpose of this information is that Loricatus Kft. visitors to its website receive information about the data management that affects them. REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (April 27, 2016) on the obligation to provide information on the protection of natural persons with regard to the processing of personal data and on the free flow of such data, and outside the scope of Regulation 95/46/EC (general data protection regulation) (hereinafter: GDPR), Article 13, also on the right to informational self-determination and CXII of 2011 on freedom of information. Act (hereinafter: Info tv.) provides § 16.

### 1. The name of the data controller

Name of data controller: Loricatus GROUP Kft.

Headquarters: 1037 Budapest, Pomázi út 11.

Represented by: Mátyás Ágoston Holman

Postal address: 1037 Budapest, Pomázi út 11.

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

Phone: 06-30-821-23-23

### Name and contact information of the data protection officer

Loricatus GROUP Kft. data protection officer:

name: Krisztián Gyarmati

Availability:

- e-mail address: [gyarmati.krisztian@loricatus.hu](mailto:gyarmati.krisztian@loricatus.hu)

### 2. Definition

personal data: any information relating to an identified or identifiable natural person ("data subject"); a natural person can be identified directly or indirectly, in particular on the basis of an identifier such as name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person can be identified

data management: any operation or set of operations performed on personal data or data files in an automated or non-automated manner, such as collection, recording, systematization, segmentation, storage, transformation or change, query, insight, use,

communication, transmission, distribution or making accessible in any other way by item, coordination or connection, restriction, deletion or destruction

data controller: the natural or legal person, public authority, agency or any other body that determines the purposes and means of processing personal data independently or together with others; if the purposes and means of data management are determined by EU or member state law, the data controller or the special aspects regarding the designation of the data controller may also be defined by EU or member state law

data processor: the natural or legal person, public authority, agency or any other body that processes personal data on behalf of the data controller

third party: the natural or legal person, public authority, agency or any other body that is not the same as the data subject, the data controller, the data processor or those persons who have been authorized to process personal data under the direct control of the data controller or data processor

### **3. The data processors used**

#### **Hosting provider**

Activity provided by data processor: hosting service

Name and contact information of the data processor:

Name: Webnode AG

registered office: Badenerstrasse 47, 8004 Zurich, Switzerland

contact e-mail: webnode@webnode.com

The fact of the data management, the scope of the managed data: All personal data provided by the data subject.

Scope of stakeholders: All stakeholders who use the website.

Purpose of data management: Making the website available and operating it properly.

Duration of data processing, deadline for data deletion: Data processing lasts until the termination of the agreement between the data controller and the storage provider, or until the deletion request of the data subject.

Legal basis for data processing: User's consent, Infotv . Section 5 (1), Article 6 (1) point a) of Regulation 2016/679 of the European Parliament and of the Council, and CVIII of 2001 on certain issues of electronic commerce services and services related to the information society. Act 13/A. (3) of §

### **4. Application of Google Analytics**

This website uses the Google Analytics application, which is provided by Google Inc. ("Google") web analytics service. Google Analytics uses so-called " cookies ", text files that are saved on your computer, thus facilitating the analysis of the use of the website visited

by the user. By using the program, the data controller mainly obtains information about how many visitors visited its website and how long the visitors spent there. The program recognizes the visitor's IP address, so it can track whether the visitor is a returning or a new visitor, and it can also track how the visitor traveled on the website and where they entered. the storage of cookies by setting their browser accordingly, but please note that in this case, not all functions of this website may be fully usable.

## 5. Social sites

Scope of processed data: Loricatus GROUP Kft. all personal data provided by the persons concerned in connection with the expressions on social media, especially Facebook/Instagram/ LinkedIn etc. their registered name on social networking sites and the users' public profile picture.

Scope of stakeholders: all stakeholders who have registered on Facebook/ Instagram/ LinkedIn etc. on social networking sites and "liked" the website.

The purpose of the data collection: On the social media pages, some content elements of the website, Loricatus Kft. sharing, "liking", promoting its services or the website itself, as well as communicating via the social network.

The data subject can find out about the source of the data, its management, the method of transfer and its legal basis on the given social media page. Data management takes place on social media sites, so the duration and method of data management, as well as the options for deleting and modifying data, are governed by the regulations of the respective social media site, which can be accessed at the following links:

Instagram: <https://help.instagram.com/155833707900388>

Facebook: [https://www.facebook.com/privacy/policy/?entry\\_point=facebook\\_page\\_footer](https://www.facebook.com/privacy/policy/?entry_point=facebook_page_footer)

LinkedIn : <https://hu.linkedin.com/legal/privacy-policy>

The legal basis for data management: the voluntary consent of the concerned person to the processing of his personal data on social networking sites.

## 6. Transmission of personal data

In the case of the data processors detailed in point 3, the reason for data transmission by Loricatus GROUP Kft. is that the data processors can carry out their activities. In other cases, the data controller will only transfer the data subject's personal data to other persons and bodies required by law (e.g. if a legal dispute takes place between the data subject and the data controller, the lawyer representing the data controller will get to know the personal data; and if court proceedings starts the case, and the court in charge needs to hand over the documents containing the data subject's personal data; or if the police or other authorities

contact the data controller, and for the purpose of conducting the investigation, the data subject's personal data requests the transmission of documents containing your data).

## **7. The data subject's rights related to data management**

The data controller evaluates the received request in the shortest possible time from the submission of the request, taking into account the legal deadline, but no later than twenty-five days, and notifies the data subject of its decision in writing or, if the data subject submitted the request electronically, by electronic means. It may happen that due to the complexity of the request, taking into account the number of ongoing requests, or in other cases justified by the data controller, the data controller will extend the deadline for evaluating the request by another 2 months, however, the data controller must inform the data subject in advance of the fact of the extension and the reasons for it .

The contact person designated by the data controller:

name: Krisztián Gyarmati

contact: [gyarmati.krisztian@loricatus.hu](mailto:gyarmati.krisztian@loricatus.hu)

The data controller can only provide general information to the data subjects over the phone, and can only accept the data subject's statement regarding the exercise of any of their rights (for example, information about their data) in writing (electronically or by post).

The data subject can initiate access to personal data, its deletion, modification or restriction of processing, portability of data, objection to data processing in the following ways:

- by post at the address of the data controller - Pomázi út 11, 1037 Budapest ,
- by e-mail at the e-mail address [loricatus@loricatus.hu](mailto:loricatus@loricatus.hu) .

### Right of access

The data subject has the right to receive feedback from the data controller as to whether his personal data is being processed, and if such data processing is in progress, he is entitled to receive access to the personal data and the information listed in the regulation.

If the data controller manages a large amount of information regarding the data subject, it may ask the data subject to specify which information or which data processing activities his/her request applies to, prior to the disclosure of the information.

As part of his right of access, the data subject may request a copy of his personal data from the data controller once free of charge.

### Right to rectification

The data subject has the right to have inaccurate personal data corrected without undue delay at the request of the data controller. The data subject has the right to request the completion of incomplete personal data, including by means of a supplementary statement.

#### The right to erasure

The data subject has the right to request that the data controller delete the personal data concerning him without undue delay, and the data controller is obliged to delete the personal data concerning the data subject without undue delay <sup>1</sup>under certain conditions.

#### The right to restrict data processing

The data subject has the right to request that the data controller restricts data processing if one of the following conditions is met:

- The data subject disputes the accuracy of the personal data, in which case the limitation applies to the period that allows the data controller to check the accuracy of the personal data;
- the data management is illegal and the data subject opposes the deletion of the data and instead requests the restriction of its use;
- the data controller no longer needs the personal data for the purpose of data management, but the data subject requires them to submit, enforce or defend legal claims;
- The data subject objected to data processing; in this case, the restriction applies to the period until it is determined whether the Data Controller's legitimate reasons take precedence over the data subject's legitimate reasons.

#### The right to data portability

The data subject has the right to receive the personal data concerning him/her provided by him/her to a data controller in a segmented, widely used, machine-readable format, and is also entitled to transmit this data to another data controller without being hindered by the data controller whose made the personal data available to you.

#### The right to protest

The data subject has the right to object to the processing of his personal data at any time for reasons related to his own situation, including profiling based on the aforementioned provisions.

#### Automated decision-making in individual cases, including profiling

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<sup>1</sup>if the data management is illegal, in particular if the data management is contrary to the basic principles, or its purpose has ceased, or the further processing of the data is no longer necessary for the realization of the purpose of the data management, or the period defined by law, international treaty or a binding legal act of the European Union has expired, or its legal basis terminated and there is no other legal basis for processing the data, - the deletion of the data was ordered by law, the Authority or the court.

The data controller does not perform automated decision-making or profiling during the data management process.

#### Withdraw consent

In addition to the above, according to the GDPR, the data subject is entitled to withdraw his consent to data management at any time. The statement of the data subject withdrawing consent is valid with a clear indication of the given data management. Withdrawal of consent does not affect the legality of data processing based on consent prior to withdrawal.

### **8. Security of data management**

The data controller implements appropriate technical and organizational measures, taking into account the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of data management, as well as the varying probability and severity of the risk to the rights and freedoms of natural persons, in order to ensure that guarantees a level of data security corresponding to the degree of risk.

Regarding the procedure for possible data management incidents, the data controller maintains a " data protection incident procedure " .

Your employees can access personal data in the manner determined by the data controller, according to authorization levels.

### **9. Right to a remedy**

You can file a complaint with the National Data Protection and Freedom of Information Authority against possible violations of the data controller:

National Data Protection and Freedom of Information Authority

1055 Budapest, Falk Miksa u. 9-11.

mailing address: 1363 Budapest, Pf.: 9.

Phone: +36 (1) 391-1400

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

In the event of a violation of his rights, the data subject may appeal to the court (at the choice of the data subject, competent according to the seat of the defendant or the residence of the data subject) against the data controller.

The list and contact details of the courts can be found at the following link:

<http://birosag.hu/torvenyszekek>